

Case Number: 16-00152	Source Type: NON TITLE V	1st Officer: RSULLIVA	Received: 03/29/2016
Permit ID: 040136	HPV:	2nd Officer:	Assigned: 04/06/2016
<i>Business Address</i>			
Respondent: HICKMANS EGG RANCH		Phone: (623) 8721120	Extension:
Street Number: 6515	St Dir: S	St Name: JACKRABBIT TR	St Suffix:
City: BUCKEYE	State: AZ	Zipcode: 85326	
Violation Location: 32425 W. SALOME HWY ARLINGTON, AZ			
Violation Date: 11/20/2015			
Mail Out: 04/20/2016	Disposition: NV-017-16-RMS	Preparation Hours:	2.00
Initial Offer Response:	Offer Accepted: 04/26/2016 0	Settlement Hours:	0.50
Conference 1:	Case Sent to AQCO: 04/26/2016 0	CA Hours:	
Conference 2:	Resolution: 04/27/2016	Notes:	353/302.2A
No Contact Letter:	Settlement Amount: \$3,910.00		360/301.97
CA Letter:	Payment Plan:		370/302.98
Sent to CA:	Due Date: 05/04/2016	OAC/RECEIPT MAILED ON 4/27/16	
Sent to EPA:	Paid in Full: 04/26/2016		
Past Due Letter:	SEP:		
Refer to Collections:			

Enforcement Id	Category	Permit Type	Permit Id	Name	Address	Inspector	Rule #	Section
735371	NOV	NON-TITLE V	040136	HICKMANS EGG RANCH	32425 W SALOME HWY	KLIMEK, SHANNON	353	302.2a
735371	NOV	NON-TITLE V	040136	HICKMANS EGG RANCH	32425 W SALOME HWY	KLIMEK, SHANNON	360	301.97
735371	NOV	NON-TITLE V	040136	HICKMANS EGG RANCH	32425 W SALOME HWY	KLIMEK, SHANNON	370	302.98



Maricopa County

Air Quality Department

Enforcement Section
1001 N. Central Ave., Suite 900
Phoenix, Arizona 85004
Phone: (602) 506-7939
Fax: (602) 506-2537

April 20, 2016

Mr. Glenn Hickman
Hickman's Egg Ranch Inc
6515 S Jackrabbit Trail
Buckeye, AZ 85326

RE: Notice of Violation #735371

Dear Mr. Hickman:

The Maricopa County Air Quality Department Enforcement Section has received a case report on the above referenced Notice of Violation.

Arizona Revised Statute § 49-513 provides authority for the Maricopa County Air Quality Department to seek statutory maximum for all alleged violations and to recover penalties of up to \$10,000 per day per violation of air quality requirements set forth in Title 49 of Arizona Revised Statutes and Maricopa County Air Pollution Control Regulations.

Enforcement calculates penalties in accordance with the Maricopa County Air Quality Department Violation Penalty Policy. The policy was established to ensure that penalties are developed in a consistent manner utilizing factors listed in Arizona Revised Statute § 49-513, and is based on the EPA Clean Air Act Civil Penalty Policy.

The Enforcement Section would like to extend to you the option of resolving your case by mail. Based on the facts of your case, we have determined a total penalty amount of **\$3,910.00**. Please find enclosed photocopies of your Notice of Violation, as well as other supporting documents. The Order of Abatement by Consent (OAC) illustrates the penalty amount as well as a payment due date of **May 4, 2016**. If you are interested in settling this matter via mail, **please review and sign the included OAC, and return the original copy promptly upon signature.**

If you believe there is additional information that should be considered with regards to the penalty calculation, please submit your position in writing to me, the Enforcement Officer at the contact information listed below within **ten (10) working days** of receipt of this letter.

Include in your response relevant information such as why the violation occurred, what control measures were implemented before and after the violation was issued, preventative measures and records/receipts supporting your position. I will contact you after reviewing the response, and if deemed appropriate, offer a recalculated penalty amount.

To view the Maricopa County Air Quality Department enforcement policies and procedures, please refer to:

<http://www.maricopa.gov/aq/divisions/enforcement>

If you have any questions about this settlement offer please contact me.

Sincerely,

A handwritten signature in black ink that reads "Reonsha Sullivan". The signature is written in a cursive, flowing style.

Reonsha Sullivan
Enforcement Officer
Office: (602) 506-6794
Fax: (602) 506-2537
ReonshaSullivan2@mail.maricopa.gov

Enclosures

REFERRAL REPORT

735371



Maricopa County Air Quality Department
1001 N. Central Avenue, Suite 125
Phoenix, AZ 85004
Phone: (602) 506-6010 Fax: (602) 506-2537
www.maricopa.gov/aq

Date: 20-Nov-15
Start Time: 0815 hrs End Time: 1300 hrs
Inspector: Shannon Klimek #92
Phone: 602.527.6288
Email: KlimekS@mail.maricopa.gov

Inspection Result:

In Violation

Inspection Type: Detail inspection On-site

Inspection Purpose: Routine

Permit Number:

040136

Hickman's Egg Ranch, Inc.
6515 S. Jackrabbit Trail
Buckeye
AZ 85326

Site Name: Hickman's Family Farms (Arlington)

Site Contact: Francisco Ruiz, Safety Director

Site Address:
32425 W. Salome Hwy.

City:
Arlington, AZ

Phone: 623.872.2341
Inspection Rights Notification:
Read and Signed Rights

ALL VIOLATIONS MUST BE CORRECTED IMMEDIATELY.



RULE	SECTION	VIOLATION TYPE	PC/STATUTE	DESCRIPTION	HPV
370	302.98	NOV	p.c. 11.c.	Owner/operator shall conduct preventative maintenance recommended by the manufacturer	<input type="checkbox"/>

Specifically: 40 CFR 63.6603(a) Table 2d(4): Emergency generator engines G-2 through G-9 on site have not received required maintenance. Details in comments.

Disposition Date/Time: March 14, 2016 / 0740 hrs to 1015 hrs

Disposition Status: Violation Corrected

Disposition Comments: I verified maintenance records current.
No further corrective action required for this particular violation:
This particular violation will be REFERRED to Enforcement.

RULE	SECTION	VIOLATION TYPE	PC/STATUTE	DESCRIPTION	HPV
360	301.97	NOV	p.c. 12.d.	Owner/operator shall conduct preventative maintenance recommended by the manufacturer	<input type="checkbox"/>

Specifically: 40 CFR 60.4211(a): Emergency generator engines G-1; G-10 through G-25; and FM-1 on site have not received manufacture recommended maintenance. Details in comments.

Disposition Date/Time: March 14, 2016 / 0740 hrs to 1015 hrs

Disposition Status: Violation Corrected

Disposition Comments: I verified maintenance records current.
No further corrective action required for this particular violation:
This particular violation will be REFERRED to Enforcement.

RULE	SECTION	VIOLATION TYPE	PC/STATUTE	DESCRIPTION	HPV
220	302.7	OTC	p.c. 13.c.	Keep copies of all reports required by the permit.	<input type="checkbox"/>

Specifically: Manufacturer's written instructions et al. for the emergency engines G-1 through G-25, and FM-1 were not kept on-site.

Disposition Date/Time: March 14, 2016 / 0740 hrs to 1015 hrs

Disposition Status: Violation Corrected

Disposition Comments: I verified maintenance schedules on site.
No further corrective action required for this particular violation:
This particular violation is RESOLVED and will NOT be referred to Enforcement.

RULE	SECTION	VIOLATION TYPE	PC/STATUTE	DESCRIPTION	HPV
353	302.2a	NOV		The fill pipe cap shall have a securely attached, intact gasket	<input type="checkbox"/>

Specifically: The gasoline storage tank fill pipe cap did not have a gasket.

Disposition Date/Time: March 14, 2016 / 0740 hrs to 1015 hrs

Disposition Status: Violation Corrected

Disposition Comments: I observed fill pipe equipped with gasket.
No further corrective action required for this particular violation:
This particular violation will be REFERRED to Enforcement.

RULE	SECTION	VIOLATION TYPE	PC/STATUTE	DESCRIPTION	HPV
220	403.2	OTC		Changes at a source with a Non-Title V permit shall require a permit revision	<input type="checkbox"/>

Specifically:

Greater than 300,000 btu/hr liquid propane fuel-burning equipment totaling 5,182,000 btu/hr observed in use at South Plant. North Plant not scrutinized at this time. No fuel-burning activities currently delineated in permit.	
Disposition Date/Time: March 14, 2016 / 0740 hrs to 1015 hrs	Disposition Status: Violation Corrected
Disposition Comments: Request for minor modification verified submitted for Fuel burning equipment, and generators. ***No further corrective action required for this particular violation:*** ***This particular violation is RESOLVED and will NOT be referred to Enforcement.***	

Comments
<p>FILE REVIEW of permit using Revision 2.0.1.0.</p> <p>Permit status: ISSUED</p> <p>Previous inspection history: NOV 723877 - R200 S301 - Failure to obtain permit or permit revision Discovery: 31-Jan-2011 NOV 732956 - R314 S301 - Unlawful open burning Discovery: 07-Mar-2014</p> <p>Prior inspection reports: Last Inspection : 28-Mar-2013: (Incomplete) Next Last Inspection: 21-Jan-2011: (See violation 723877 above)</p> <p>Operating parameters: Rule 320 (Hydrogen Sulfide); Rule 324 (Emergency Engines); Rule 353 (Gasoline Non-resale)</p> <p>Miscellaneous:</p> <ul style="list-style-type: none"> • Crematory allegedly disconnected. (Rule 313) • Mulching and Fertilizer piles to be scrutinized for burning (Rule 314) • No Dust Control Plan required as operation is A.R.S. § 49-457 exempt. • No O&M Plan required because there are no applicable ECS. • Permit Mod pending to remove Feed Milling from permit due to potential A.R.S. § 49-457 exemption. • Permit conditions for Fuel Burning associated with drum dryer's fertilizer processing not delineated in conditions yet. (Rule 323) <p>Performance testing requirements: Compliance demonstration for Hydrogen Sulfide</p> <p>Emissions limits: n/a</p> <p>Annual fee: Current</p> <p>INSPECTION:</p> <p>I conducted a routine inspection to verify compliance with Permit 040136 Revision 2.0.1.0.</p> <p>I met on site with Compliance Manager, Shari Yeatts, and Safety and Health Coordinator, Frank Ruiz and explained the purpose of the inspection:</p> <p>I was initially accompanied by Permitting Engineers, Li Sa Kon; Sara Seuberling; and Michael Sonenburg; but they opted to accompany Ms. Yeatts while Mr. Ruiz accompanied me for the duration of the inspection.</p> <p>I photographed some of my observations.</p> <p>Crematory:</p> <p>Equipment not connected to a fuel source or process.</p> <p>Mulching Operations:</p> <p>No burning mulch material observed during scrutiny.</p> <p>Odor Control:</p> <p>No strong odors observed. No records requested due to my familiarity and observation of compliance with occasional Hydrogen Sulfide reports requested by Department throughout 2015.</p> <p>Emergency Engines:</p> <p>I visually inspected and photographed each of the emergency engines throughout the facility, noting make, model, serial number, current engine hours, BHP, and for some; the dates of the most recent oil-filter changes.</p> <p>VIOLATION: [Rule 370 Section 302.98; p.c. 11.c.]</p> <p>Failure to perform manufacturer scheduled maintenance on emergency generators, observed as follows:</p> <ul style="list-style-type: none"> • G-2 to G-9 Total of 8 generators. <ul style="list-style-type: none"> • Maintenance records unavailable for past 5 years. • Mr. Ruiz provided me with total of 7 maintenance log entries for August 2014 oil changes for 5 of the 8 generators. Prior records were not provided. • Mr. Ruiz stated: <ul style="list-style-type: none"> • The facility's Shop Manager left in 2013. • The current Shop Manager commenced in late 2014. • Prior logs not located and consequently could not be provided. • Last inspection conducted in which compliance was verified by Department: 21-Jan-2011.

- I informed Mr. Ruiz this is an NOV violation.

REQUIRED CORRECTIVE ACTION: [Rule 370 Section 302.98; p.c. 11.c.]

Conduct all inspections and maintenance required per 40 CFR 63.6603(a) Table 2d(4) for each of the 8 generators delineated in permit condition 11 (i.e. G-2 through G-9) for which most recent required log entry has not been provided since the respective generator's installation; then submit to the Department as follows:

- Generators G-2 through G-9: [Total of 8 generators.]
 - Oil and Filter change or oil analysis results, date of change, and corresponding hours on the hour meter.
 - Inspection of air cleaner, date of inspection, and replacement date if replaced.
 - Inspection of all hoses and belts, date of inspection, and replacement date if replaced.
 - Submit to the Department the above delineated log entries within 14 business days of receipt of this report.

[NOTE: Conduct required inspections and maintenance regularly following submittal.]

VIOLATION: [Rule 360 Section 301.97; p.c. 12.d.]

Failure to perform manufacturer scheduled maintenance on emergency generators, observed as follows:

- G-1; G-10 through G-25; and FM-1; Total of 18 generators.
 - Maintenance records unavailable for past 5 years.
 - Maintenance records unavailable for G-20, G-21, G-22; and FM-1 since installation in 2012.
 - Maintenance records unavailable for G-23; G-24; and G-25 since installation in 2014.
- Mr. Ruiz provided me with total of 2 maintenance log entries for Aug 2014 oil changes for 2 of the 18 generators. Prior records were not provided.
- Mr. Ruiz stated:
 - The facility's Shop Manager left in 2013.
 - The current Shop Manager commenced in late 2014.
 - Prior logs not located and consequently could not be provided.
- Last inspection conducted in which compliance was verified by Department: 21-Jan-2011.
- I informed Mr. Ruiz this is an NOV violation.

REQUIRED CORRECTIVE ACTION: [Rule 360 Section 301.97; p.c. 12.d.]

Conduct all inspections and maintenance required for each particular generator for which most recent required log entry has not been provided since the respective generator's installation; then submit to the Department as follows:

- For emergency generator: G-1; G-10; G-11; G-20 through G-25; and FM-1; Total of 10 generators:
 - All items within attached maintenance schedule: CUMMINS / ONAN POWER GENERATION MAINTENANCE GUIDELINES --This is the document Mr. Ruiz provided me via email on 15-Dec-2015 to prove compliance with permit condition 13.c.;
 - OR, Comply with 40 CFR 60.4211(g)(2) summarized as follows:
 - Keep a maintenance plan and records of conducted maintenance and must, to the extent practicable, maintain and operate the engine in a manner consistent with good air pollution control practice for minimizing emissions.
 - In addition, you must conduct an initial performance test to demonstrate compliance within 1 year after an engine and control device is no longer installed, configured, operated, and maintained in accordance with the manufacturer's emission-related written instructions.
 - For emergency generators: G-13, G-14; G-16 through G-19; Total of 6 generators:
 - All items within attached maintenance schedule: POWERTECH PLUS 9.0L 6090HF485 Tier III/Stage IIIA OEM DIESEL ENGINES --This is the document Mr. Ruiz provided me via email on 15-Dec-2015 to prove compliance with permit condition 13.c.;
 - OR, Comply with 40 CFR 60.4211(g)(2) summarized as follows:
 - Keep a maintenance plan and records of conducted maintenance and must, to the extent practicable, maintain and operate the engine in a manner consistent with good air pollution control practice for minimizing emissions.
 - In addition, you must conduct an initial performance test to demonstrate compliance within 1 year after an engine and control device is no longer installed, configured, operated, and maintained in accordance with the manufacturer's emission-related written instructions.
 - For emergency generator: G-12
 - All items within attached maintenance schedule: Detroit Diesel Series 60 Engine Operator's Guide, Serial Number 162036. This is the document Mr. Ruiz provided me via email on 13-Jan-2016 to prove compliance with permit condition 13.c.;
 - For emergency generator: G-15
 - All items within attached maintenance schedule: Katolight (Owner Manual) Serial Number 161491. This is the document Mr. Ruiz provided me via email on 13-Jan-2016 to prove compliance with permit condition 13.c.;
- [NOTE: Conduct required inspections and maintenance regularly following submittal.]

VIOLATION: [Rule 220 Section 302.7; p.c. 13.c.;]

- During on-site inspection, Mr. Ruiz stated the Owner's Manuals are maintained at Jackrabbit Office but did not know where they were

anymore because the office where it was kept was re-purposed but arranged to locate the owner manuals and email me excerpt's for each respective engine manufacturer's recommended Inspection and Maintenance schedule to prove the manuals were present.

- I explained to Mr. Ruiz this is a failure to maintain an on-site copy and I was issuing an OTC violation which will be resolved by the submittal of the arranged excerpts.
- Record submittal pushed back at Mr. Ruiz's request until December 7, 2015.
- On December 15, 2015; Mr. Ruiz submitted the Manufacturer's Recommended Inspection and Maintenance excerpts excluding unit G-12 and G-15.
- On January 8, 2016; upon review of documents, I emailed Mr. Ruiz informing him I was still waiting on the owners manual's manufacturer recommended inspection and maintenance schedules for unit G-12 and G-15.
- On January 13, 2016; Mr. Ruiz submitted the owner manuals excerpts for units G-12 and G-15.

REQUIRED CORRECTIVE ACTION: [Rule 220 Section 302.7; p.c. 13.c.]

- Obtain and maintain an on-site copy of the manufacturer's written instructions.
- Provide the requested documents promptly for verification and disposition of this OTC.

AREA OF CONCERN: [Rule 324 Section 502.4; p.c. 13.a.]

Failure to keep a monthly record of engine hours of operation, for the purpose of a 12-month rolling record of engine hours as follows:

- G-12 through G-19 [Total of 8 generators.]
 - Mr. Ruiz submitted a log of engine hours for the total number of engine hours each respective generator ran for a particular calendar year, for Nov/Dec 2011, calendar years 2012 through 2015.
 - Violation based upon generator hours records provided for G-12 through G-19 on November 2011 and December 2011; which state, "unknown" quantity of hours.
On December 7, 2015; I telephoned Mr. Ruiz and explained the requirement to keep a record of the rolling 12-month engine hours. I explained to Mr. Ruiz this is not a record of the calendar year hours. Mr. Ruiz explained the non-compliance was inadvertent; and he is becoming increasingly more proficient with compliance as he learns.
 - Number of hours on engine raises no concerns about exceeding allowable engine hours as quantities are very low; and I have observed improvements in record keeping of logging process for readiness and testing hours, evidenced by log sheets kept inside housing of most generators; and also evidenced by distinctions of hour logged since 2014.
 - SUGGESTION: Going forward, keep records of data required for a 12-month rolling total of engine hours, for each engine. These should be presented as rolling 12-mo totals i.e. 12 monthly totals where if period requested if more than 12 consecutive months, then each consecutive 12 months has a separate 12-mo rolling total.

Gasoline Storage and Dispensing:

I observed the following:

- Facility has an above-ground 500-gallon gasoline above-ground storage tank located at the South Plant.
- There is no spill containment.
- There is no Stage I vapor recovery connection.
- The vent pipe on the tank has a double outlet vent device installed at the tip. No pressure/vacuum valve is installed on vent pipe.
- The tank already has two pressure vents installed on the top of the tank.
- Unknown tank manufacture date....not delineated in any prior permit applications, permit mod applications, TSD's, et al.
- Rule 353 Section 305.1 exemption to Farm Tanks is less stringent than 40 CFR 63.11116(a). Necessarily, the more stringent of the two regulations is applicable.
- Throughput records provided by Mr. Ruiz show a monthly throughput less than 10,000 gal/mo. The highest month noted for the period Nov-2014 though Oct-2015 was for the month of July-2015 at 2,317 gal.

VIOLATION: [Rule 353 Section 302.2 a.]

- Threaded and domed solid metal fill pipe cap, no gasket.
- I photographed this observation.
- I informed Mr. Ruiz I was issuing a NOV for the failure to have gasket on the fill pipe cap and suggested a gasket be installed immediately.
- Mr. Ruiz responded immediately by ordering the facility maintenance personnel to install a gasket on the fill pipe cap.
- On February 1, 2016; I telephoned Mr. Ruiz and reviewed the violation and corrective action required; Mr. Ruiz stated the gasket was placed on the fill pipe cap the date of inspection. I informed I would necessarily return to verify during Disposition inspection.

REQUIRED CORRECTIVE ACTION: [Rule 353 Section 302.2 a.]

- Install gasket on fill pipe cap.

Inspection observations of unpermitted activity i.e. Fuel Burning:

VIOLATION: [Rule 200 Section 403.2]

Unpermitted L.P. (liquid propane) fuel burning equipment observed installed and in active use at facility as follows:

South Plant:

West Boiler: 1,210,000 btu/hr
 East Boiler: 1,460,000 btu/hr
 Water heater #112: 1,256,000 btu/hr
 Water heater #113: 1,256,000 btu/hr

North Plant:

Mr. Ruiz stated additional fuel burning equipment were present ancillary to North Plant, but I did not have opportunity to observe.

Fertilizer Plant:

I did not observe the L.P. fueled drum dryer, for which a permit modification has already been submitted. This equipment is not on the current permit, and I made no attempt to observe at this time.

- Total unpermitted fuel burning equipment actually observed and verified as delineated above: 5,182,000 btu/hr.
- The permit has no current L.P. fuel-burning permit conditions.
- No L.P. fuel burning equipment > 10 million btu/hr observed.
- I informed Mr. Ruiz the facility is in violation of the failure to submit a minor-modification to the permit prior to installing respective equipment.

REQUIRED CORRECTIVE ACTION: [Rule 200 Section 403.2]

- Submit minor-modification for addition of all fuel-burning equipment 300,000 btu/hr or greater to the permit.
- Include the applicable fuel-burning equipment not observed in the North facility.
- I suggest including a list of all fuel-burning equipment > 125,000 input btu/hr based on suggestion from Permitting Supervisor, Todd Martin.
- Per Permitting Supervisor, Todd Martin, it is sufficient to add the above equipment to the current pending minor-modification.

AREA OF CONCERN: [Rule 200 Section 403.2]

- Mr. Ruiz stated emergency generators G-39, and G-42 replaced generators G-3 and G-4 respectively.
- Mr. Ruiz stated generator G-3 was relocated to Jackrabbit office, and G-4 was relocated to new maintenance facility under construction and part of Permit 040136, to be installed later.
- New generators G-43 and G-44 were observed on site, but not yet connected to electrical cables to provide emergency power to the facility.
- Include Emergency generators G-4, G-43, and G-44, to the minor modification prior to installation at this particular facility.
- I recommend complete list of emergency generator data be submitted along with minor-modification documents to alleviate confusion by the replacement of G-4 and its subsequent re-installation at the facility.

DISPOSITION:

On March 14, 2016; 0740 hrs - 1015 hrs; I conducted the re-inspection arranged with Mr. Ruiz for the purposes of verifying the required corrective actions have been conducted. This re-inspection was conducted with two continued inspections consecutive to this one in which I traveled to the source's Jackrabbit Trail office and returned.

I was accompanied by Inspector Supervisor, Bryan Mandalfino.

I met on site with the following persons during the re-inspection:

- Frank Ruiz, Safety
- Shari Yeatts, Compliance Director
- David Doyal Goss, Maintenance Supervisor

0740 hrs to 1015 hrs: Arlington Facility:

I verified all of the required corrective actions have been completed for the particular violations issued; but one area of concern was discovered during my on-site review of maintenance records for emergency generator G-2 which follows:

AREA OF CONCERN:

Emergency generator G-2 preventative maintenance log for 16-May-2015 evidences an hour reset had occurred prior to commencement of this maintenance. Mr. Ruiz explained an EPROM error "Code 25" was displayed and logged, but the proximate cause of the error was unknown and did not occur concurrent with any maintenance (It was present at start of logged maintenance on 16-May-2015).

Albeit I was able to deduce the expended hours with the data in front of me, I informed Mr. Ruiz there is a necessary protocol that is required to be met when this occurs. I arranged to research and include in this report as follows:

- Permanently log the date of reset and the last known engine hours prior to reset on the engine's control panel as an "offset" for future log entries.
- Log both the visible hourly reading and the offset on future logs entries for this particular generator set.

Comments

Another area of concern was discovered as Ms. Yeatts informed me of the facility's plans to construct a new protein plant, which will be used for animal processing.

I informed Ms. Yeatts of my concern this may require permitting, but would research this. My area of concern follows:

AREA OF CONCERN: [Rule 220 Subsection 405.3]

Construction of a protein plant applicable to Rule 320 Subsection 301, and has the potential to generate VOC's during the animal processing.

I spoke to Permit Engineer, Sara Seuberling who stated no permit modification has been requested for this potential source of air pollution. Ms. Seuberling's opinion was this source requires a non-minor modification subject to Rule 220 Subsection 405.3.

On March 24, 2016; I telephoned Ms. Yeatts and informed her of my research and strongly suggested submittal of a request for non-minor modification of the source's permit. Ms. Yeatts requested what I told her via email so she could immediately address this.

I emailed Ms. Yeatts summarizing my findings a request for non-minor modification is due prior to commencing operation of the protein plant.

1130 hrs to 1215 hrs: Inspection-continued: Jackrabbit Trail Facility's Maintenance office:

I completed verification of maintenance records, verifying corrective actions completed. Source does annual oil analysis, which Mr. Goss states is not used for determining whether oil change is needed -- because oil changes are completed annually regardless. Mr. Goss explained the soot content in the oil analysis is used to determine whether the air cleaner requires filter replacement.

1245 hrs to 1310 hrs: Inspection continued: Arlington Facility (South). I rescinded a particular violation regarding observed ventilation on the facility's above ground gasoline storage tank which I found at this time to have no merit. An Inspection Report Correction Notice and the original Inspection report dated 20-Nov-2015 documented the details of which will not be found in this report.

All noted violations have been verified corrected.

REFERRAL:

On March 24, 2016; I submitted the Disposition Report for mailing via US MAIL.

ATTACHMENTS:

- Inspection photo attachment

End report.



Maricopa County

Air Quality Department

Compliance Division 1001
North Central Ave., Suite
125 Phoenix, Arizona
85004 Phone:
602-506-6010
Fax: 602-506-2163

Dear Responsible Party:

RE: Disposition

You are receiving this letter as a result of disposition of previous violations at your site/facility. The enclosed Disposition explains the status of the violations observed during the previous inspection.

The current status of any violations listed on the Violation or Disposition can be tracked online at the following address: http://www.maricopa.gov/aq/divisions/enforcement/nov/nov_status.aspx If access to the internet is unavailable, please call 602.506.6734 to obtain the status of the violation(s).

Should you wish to respond in any way to this violation, written correspondence regarding this violation should be sent so that it is received within 10 business days from the date of receipt of the original Violation notice. Please include the permit and violation number in your written correspondence.

If you believe the basis of the violation is not accurate and no violation occurred, the department offers an opportunity to request a review of the inspection findings. A formal request for review must be made within 10 business days of receipt of this violation. The written request should provide sufficient information to allow the department to make an informed and objective assessment and recommendation regarding the issues raised in defense. A request for a review must include the identifying number of the Notice of Violation. You may submit a request by letter, completing the online form at <http://www.maricopa.gov/aq/divisions/Ombudsman/Default.aspx> or by e-mail:

Business Assistance Coordinator
Maricopa County Air Quality Department
1001 N. Central Ave., Suite 125
Phoenix, AZ 85004
AQbusinessassistance@mail.maricopa.gov
(602) 506-5102

The information located on the back page of this letter will clarify the acronyms and policies referenced on your Violation. Further information about the Maricopa County Air Quality Department (MCAQD) Rules and Regulations can be found at the MCAQD website: www.maricopa.gov/aq

Additional information about how you can improve air quality in Maricopa County can be found at www.CleanAirMakeMore.com

If you have any questions, you may contact the inspector noted on your Violation or contact a Maricopa County Air Quality Department Compliance Supervisor at (602) 506-6734.

Thank you,

Air Quality Compliance Division
602-506-6734

Acronyms used in the Inspection Report		
≤ – Less than or equal to	CM – Certified Mail	NTV – Non Title V
≥ – Greater than or equal to	COMS – Continuous Opacity Monitoring System	O&M Plan – Operations and Maintenance Plan
AAP – Area Accessible to the Public	DCP – Dust Control Plan	PC – Permit Condition
ACWM – Asbestos Containing Waste Material	DGO – Dust Generating Operation	RACM – Regulated Asbestos Containing Material
ASHARA – Asbestos School Hazard Abatement Reauthorization Act	ECS – Emissions Control System	RM – Regular Mail
AHERA – Asbestos Hazard Emergency Response Act	HAP – Hazardous Air Pollutant	Stab. – Stabilize
ATI – At the time of inspection	HAPRACT – Hazardous Air Pollutant Reasonable Available Control Technology	TO – Track Out
AZMACT – Arizona Maximum Achievable Control Technology	HT – Haul Truck	TOCD – Track Out Control Device
CARB – California Air Resource Board	N/A – Not Applicable	VEE – Visible Emissions Evaluation
CEMS – Continuous Emission Monitoring System	N/O – Not Observed	VOC – Volatile Organic Compound

OTC - OPPORTUNITY TO CORRECT: You are hereby notified that you **must** correct the violation(s) of Maricopa County Air Pollution Control Regulations or the specific condition(s) of your air quality permit as indicated on the Violation Notice **immediately**. Failure to correct the condition(s) **immediately** can result in an NOV.

NOV - NOTICE OF VIOLATION: You are hereby notified that you are **in violation** of the Maricopa County Air Pollution Control Regulations or specific condition(s) of your air quality permit as indicated on the Violation Notice. **The violation(s) must be corrected immediately. All notices of violation are referred to the Maricopa County Air Quality Department Enforcement Division or the Maricopa County Attorney for further enforcement action.**

WARNING NOTICE: A Warning Notice which by rule or ordinance requires a period of time to correct a deficiency or to notify the department. A Warning Notice is not referred for penalties but subsequent violation will be assessed penalties.

The owner/operator is ultimately responsible for maintaining the site/facility in compliance with Maricopa County rules and regulations at all times.

DISPOSITION

735371



Maricopa County Air Quality Department
1001 N. Central Avenue, Suite 125
Phoenix, AZ 85004
Phone: (602) 506-6010 Fax: (602) 506-2537
www.maricopa.gov/aq

Date: 20-Nov-15
Start Time: 0815 hrs End Time: 1300 hrs
Inspector: Shannon Klimek #92
Phone: 602.527.6288
Email: KlimekS@mail.maricopa.gov

Inspection Result:

In Violation

Inspection Type: Detail inspection On-site

Inspection Purpose: Routine

Permit Number:

040136

Hickman's Egg Ranch, Inc.**6515 S. Jackrabbit Trail****Buckeye****AZ 85326**

Site Name: Hickman's Family Farms (Arlington)

Site Contact: Francisco Ruiz, Safety Director

Site Address:
32425 W. Salome Hwy.

City:
Arlington, AZ

Phone: 623.872.2341
Inspection Rights Notification:
Read and Signed Rights

ALL VIOLATIONS MUST BE CORRECTED IMMEDIATELY.



RULE	SECTION	VIOLATION TYPE	PC/STATUTE	DESCRIPTION	HPV
370	302.98	NOV	p.c. 11.c.	Owner/operator shall conduct preventative maintenance recommended by the manufacturer	<input type="checkbox"/>

Specifically: 40 CFR 63.6603(a) Table 2d(4): Emergency generator engines G-2 through G-9 on site have not received required maintenance. Details in comments.

Disposition Date/Time: March 14, 2016 / 0740 hrs to 1015 hrs

Disposition Status: Violation Corrected

Disposition Comments: I verified maintenance records current.
No further corrective action required for this particular violation:
This particular violation will be REFERRED to Enforcement.

RULE	SECTION	VIOLATION TYPE	PC/STATUTE	DESCRIPTION	HPV
360	301.97	NOV	p.c. 12.d.	Owner/operator shall conduct preventative maintenance recommended by the manufacturer	<input type="checkbox"/>

Specifically: 40 CFR 60.4211(a): Emergency generator engines G-1; G-10 through G-25; and FM-1 on site have not received manufacture recommended maintenance. Details in comments.

Disposition Date/Time: March 14, 2016 / 0740 hrs to 1015 hrs

Disposition Status: Violation Corrected

Disposition Comments: I verified maintenance records current.
No further corrective action required for this particular violation:
This particular violation will be REFERRED to Enforcement.

RULE	SECTION	VIOLATION TYPE	PC/STATUTE	DESCRIPTION	HPV
220	302.7	OTC	p.c. 13.c.	Keep copies of all reports required by the permit.	<input type="checkbox"/>

Specifically: Manufacturer's written instructions et al. for the emergency engines G-1 through G-25, and FM-1 were not kept on-site.

Disposition Date/Time: March 14, 2016 / 0740 hrs to 1015 hrs

Disposition Status: Violation Corrected

Disposition Comments: I verified maintenance schedules on site.
No further corrective action required for this particular violation:
This particular violation is RESOLVED and will NOT be referred to Enforcement.

RULE	SECTION	VIOLATION TYPE	PC/STATUTE	DESCRIPTION	HPV
353	302.2a	NOV		The fill pipe cap shall have a securely attached, intact gasket	<input type="checkbox"/>

Specifically: The gasoline storage tank fill pipe cap did not have a gasket.

Disposition Date/Time: March 14, 2016 / 0740 hrs to 1015 hrs

Disposition Status: Violation Corrected

Disposition Comments: I observed fill pipe equipped with gasket.
No further corrective action required for this particular violation:
This particular violation will be REFERRED to Enforcement.

RULE	SECTION	VIOLATION TYPE	PC/STATUTE	DESCRIPTION	HPV
220	403.2	OTC		Changes at a source with a Non-Title V permit shall require a permit revision	<input type="checkbox"/>

Specifically:

Greater than 300,000 btu/hr liquid propane fuel-burning equipment totaling 5,182,000 btu/hr observed in use at South Plant. North Plant not scrutinized at this time. No fuel-burning activities currently delineated in permit.	
Disposition Date/Time: March 14, 2016 / 0740 hrs to 1015 hrs	Disposition Status: Violation Corrected
Disposition Comments: Request for minor modification verified submitted for Fuel burning equipment, and generators. ***No further corrective action required for this particular violation:*** ***This particular violation is RESOLVED and will NOT be referred to Enforcement.***	

Comments
<p>FILE REVIEW of permit using Revision 2.0.1.0.</p> <p>Permit status: ISSUED</p> <p>Previous inspection history: NOV 723877 - R200 S301 - Failure to obtain permit or permit revision Discovery: 31-Jan-2011 NOV 732956 - R314 S301 - Unlawful open burning Discovery: 07-Mar-2014</p> <p>Prior inspection reports: Last Inspection : 28-Mar-2013: (Incomplete) Next Last Inspection: 21-Jan-2011: (See violation 723877 above)</p> <p>Operating parameters: Rule 320 (Hydrogen Sulfide); Rule 324 (Emergency Engines); Rule 353 (Gasoline Non-resale)</p> <p>Miscellaneous:</p> <ul style="list-style-type: none"> • Crematory allegedly disconnected. (Rule 313) • Mulching and Fertilizer piles to be scrutinized for burning (Rule 314) • No Dust Control Plan required as operation is A.R.S. § 49-457 exempt. • No O&M Plan required because there are no applicable ECS. • Permit Mod pending to remove Feed Milling from permit due to potential A.R.S. § 49-457 exemption. • Permit conditions for Fuel Burning associated with drum dryer's fertilizer processing not delineated in conditions yet. (Rule 323) <p>Performance testing requirements: Compliance demonstration for Hydrogen Sulfide</p> <p>Emissions limits: n/a</p> <p>Annual fee: Current</p> <p>INSPECTION:</p> <p>I conducted a routine inspection to verify compliance with Permit 040136 Revision 2.0.1.0.</p> <p>I met on site with Compliance Manager, Shari Yeatts, and Safety and Health Coordinator, Frank Ruiz and explained the purpose of the inspection:</p> <p>I was initially accompanied by Permitting Engineers, Li Sa Kon; Sara Seuberling; and Michael Sonenburg; but they opted to accompany Ms. Yeatts while Mr. Ruiz accompanied me for the duration of the inspection.</p> <p>I photographed some of my observations.</p> <p>Crematory:</p> <p>Equipment not connected to a fuel source or process.</p> <p>Mulching Operations:</p> <p>No burning mulch material observed during scrutiny.</p> <p>Odor Control:</p> <p>No strong odors observed. No records requested due to my familiarity and observation of compliance with occasional Hydrogen Sulfide reports requested by Department throughout 2015.</p> <p>Emergency Engines:</p> <p>I visually inspected and photographed each of the emergency engines throughout the facility, noting make, model, serial number, current engine hours, BHP, and for some; the dates of the most recent oil-filter changes.</p> <p>VIOLATION: [Rule 370 Section 302.98; p.c. 11.c.]</p> <p>Failure to perform manufacturer scheduled maintenance on emergency generators, observed as follows:</p> <ul style="list-style-type: none"> • G-2 to G-9 Total of 8 generators. <ul style="list-style-type: none"> • Maintenance records unavailable for past 5 years. • Mr. Ruiz provided me with total of 7 maintenance log entries for August 2014 oil changes for 5 of the 8 generators. Prior records were not provided. • Mr. Ruiz stated: <ul style="list-style-type: none"> • The facility's Shop Manager left in 2013. • The current Shop Manager commenced in late 2014. • Prior logs not located and consequently could not be provided. • Last inspection conducted in which compliance was verified by Department: 21-Jan-2011.

- I informed Mr. Ruiz this is an NOV violation.

REQUIRED CORRECTIVE ACTION: [Rule 370 Section 302.98; p.c. 11.c.]

Conduct all inspections and maintenance required per 40 CFR 63.6603(a) Table 2d(4) for each of the 8 generators delineated in permit condition 11 (i.e. G-2 through G-9) for which most recent required log entry has not been provided since the respective generator's installation; then submit to the Department as follows:

- Generators G-2 through G-9: [Total of 8 generators.]
 - Oil and Filter change or oil analysis results, date of change, and corresponding hours on the hour meter.
 - Inspection of air cleaner, date of inspection, and replacement date if replaced.
 - Inspection of all hoses and belts, date of inspection, and replacement date if replaced.
 - Submit to the Department the above delineated log entries within 14 business days of receipt of this report.

[NOTE: Conduct required inspections and maintenance regularly following submittal.]

VIOLATION: [Rule 360 Section 301.97; p.c. 12.d.]

Failure to perform manufacturer scheduled maintenance on emergency generators, observed as follows:

- G-1; G-10 through G-25; and FM-1; Total of 18 generators.
 - Maintenance records unavailable for past 5 years.
 - Maintenance records unavailable for G-20, G-21, G-22; and FM-1 since installation in 2012.
 - Maintenance records unavailable for G-23; G-24; and G-25 since installation in 2014.
- Mr. Ruiz provided me with total of 2 maintenance log entries for Aug 2014 oil changes for 2 of the 18 generators. Prior records were not provided.
- Mr. Ruiz stated:
 - The facility's Shop Manager left in 2013.
 - The current Shop Manager commenced in late 2014.
 - Prior logs not located and consequently could not be provided.
- Last inspection conducted in which compliance was verified by Department: 21-Jan-2011.
- I informed Mr. Ruiz this is an NOV violation.

REQUIRED CORRECTIVE ACTION: [Rule 360 Section 301.97; p.c. 12.d.]

Conduct all inspections and maintenance required for each particular generator for which most recent required log entry has not been provided since the respective generator's installation; then submit to the Department as follows:

- For emergency generator: G-1; G-10; G-11; G-20 through G-25; and FM-1; Total of 10 generators:
 - All items within attached maintenance schedule: CUMMINS / ONAN POWER GENERATION MAINTENANCE GUIDELINES --This is the document Mr. Ruiz provided me via email on 15-Dec-2015 to prove compliance with permit condition 13.c.;
 - OR, Comply with 40 CFR 60.4211(g)(2) summarized as follows:
 - Keep a maintenance plan and records of conducted maintenance and must, to the extent practicable, maintain and operate the engine in a manner consistent with good air pollution control practice for minimizing emissions.
 - In addition, you must conduct an initial performance test to demonstrate compliance within 1 year after an engine and control device is no longer installed, configured, operated, and maintained in accordance with the manufacturer's emission-related written instructions.
 - For emergency generators: G-13, G-14; G-16 through G-19; Total of 6 generators:
 - All items within attached maintenance schedule: POWERTECH PLUS 9.0L 6090HF485 Tier III/Stage IIIA OEM DIESEL ENGINES --This is the document Mr. Ruiz provided me via email on 15-Dec-2015 to prove compliance with permit condition 13.c.;
 - OR, Comply with 40 CFR 60.4211(g)(2) summarized as follows:
 - Keep a maintenance plan and records of conducted maintenance and must, to the extent practicable, maintain and operate the engine in a manner consistent with good air pollution control practice for minimizing emissions.
 - In addition, you must conduct an initial performance test to demonstrate compliance within 1 year after an engine and control device is no longer installed, configured, operated, and maintained in accordance with the manufacturer's emission-related written instructions.
 - For emergency generator: G-12
 - All items within attached maintenance schedule: Detroit Diesel Series 60 Engine Operator's Guide, Serial Number 162036. This is the document Mr. Ruiz provided me via email on 13-Jan-2016 to prove compliance with permit condition 13.c.;
 - For emergency generator: G-15
 - All items within attached maintenance schedule: Katolight (Owner Manual) Serial Number 161491. This is the document Mr. Ruiz provided me via email on 13-Jan-2016 to prove compliance with permit condition 13.c.;
- [NOTE: Conduct required inspections and maintenance regularly following submittal.]

VIOLATION: [Rule 220 Section 302.7; p.c. 13.c.;]

- During on-site inspection, Mr. Ruiz stated the Owner's Manuals are maintained at Jackrabbit Office but did not know where they were

anymore because the office where it was kept was re-purposed but arranged to locate the owner manuals and email me excerpt's for each respective engine manufacturer's recommended Inspection and Maintenance schedule to prove the manuals were present.

- I explained to Mr. Ruiz this is a failure to maintain an on-site copy and I was issuing an OTC violation which will be resolved by the submittal of the arranged excerpts.
- Record submittal pushed back at Mr. Ruiz's request until December 7, 2015.
- On December 15, 2015; Mr. Ruiz submitted the Manufacturer's Recommended Inspection and Maintenance excerpts excluding unit G-12 and G-15.
- On January 8, 2016; upon review of documents, I emailed Mr. Ruiz informing him I was still waiting on the owners manual's manufacturer recommended inspection and maintenance schedules for unit G-12 and G-15.
- On January 13, 2016; Mr. Ruiz submitted the owner manuals excerpts for units G-12 and G-15.

REQUIRED CORRECTIVE ACTION: [Rule 220 Section 302.7; p.c. 13.c.]

- Obtain and maintain an on-site copy of the manufacturer's written instructions.
- Provide the requested documents promptly for verification and disposition of this OTC.

AREA OF CONCERN: [Rule 324 Section 502.4; p.c. 13.a.]

Failure to keep a monthly record of engine hours of operation, for the purpose of a 12-month rolling record of engine hours as follows:

- G-12 through G-19 [Total of 8 generators.]
 - Mr. Ruiz submitted a log of engine hours for the total number of engine hours each respective generator ran for a particular calendar year, for Nov/Dec 2011, calendar years 2012 through 2015.
 - Violation based upon generator hours records provided for G-12 through G-19 on November 2011 and December 2011; which state, "unknown" quantity of hours.
On December 7, 2015; I telephoned Mr. Ruiz and explained the requirement to keep a record of the rolling 12-month engine hours. I explained to Mr. Ruiz this is not a record of the calendar year hours. Mr. Ruiz explained the non-compliance was inadvertent; and he is becoming increasingly more proficient with compliance as he learns.
 - Number of hours on engine raises no concerns about exceeding allowable engine hours as quantities are very low; and I have observed improvements in record keeping of logging process for readiness and testing hours, evidenced by log sheets kept inside housing of most generators; and also evidenced by distinctions of hour logged since 2014.
 - SUGGESTION: Going forward, keep records of data required for a 12-month rolling total of engine hours, for each engine. These should be presented as rolling 12-mo totals i.e. 12 monthly totals where if period requested if more than 12 consecutive months, then each consecutive 12 months has a separate 12-mo rolling total.

Gasoline Storage and Dispensing:

I observed the following:

- Facility has an above-ground 500-gallon gasoline above-ground storage tank located at the South Plant.
- There is no spill containment.
- There is no Stage I vapor recovery connection.
- The vent pipe on the tank has a double outlet vent device installed at the tip. No pressure/vacuum valve is installed on vent pipe.
- The tank already has two pressure vents installed on the top of the tank.
- Unknown tank manufacture date....not delineated in any prior permit applications, permit mod applications, TSD's, et al.
- Rule 353 Section 305.1 exemption to Farm Tanks is less stringent than 40 CFR 63.11116(a). Necessarily, the more stringent of the two regulations is applicable.
- Throughput records provided by Mr. Ruiz show a monthly throughput less than 10,000 gal/mo. The highest month noted for the period Nov-2014 though Oct-2015 was for the month of July-2015 at 2,317 gal.

VIOLATION: [Rule 353 Section 302.2 a.]

- Threaded and domed solid metal fill pipe cap, no gasket.
- I photographed this observation.
- I informed Mr. Ruiz I was issuing a NOV for the failure to have gasket on the fill pipe cap and suggested a gasket be installed immediately.
- Mr. Ruiz responded immediately by ordering the facility maintenance personnel to install a gasket on the fill pipe cap.
- On February 1, 2016; I telephoned Mr. Ruiz and reviewed the violation and corrective action required; Mr. Ruiz stated the gasket was placed on the fill pipe cap the date of inspection. I informed I would necessarily return to verify during Disposition inspection.

REQUIRED CORRECTIVE ACTION: [Rule 353 Section 302.2 a.]

- Install gasket on fill pipe cap.

Inspection observations of unpermitted activity i.e. Fuel Burning:

VIOLATION: [Rule 200 Section 403.2]

Unpermitted L.P. (liquid propane) fuel burning equipment observed installed and in active use at facility as follows:

South Plant:

West Boiler: 1,210,000 btu/hr
 East Boiler: 1,460,000 btu/hr
 Water heater #112: 1,256,000 btu/hr
 Water heater #113: 1,256,000 btu/hr

North Plant:

Mr. Ruiz stated additional fuel burning equipment were present ancillary to North Plant, but I did not have opportunity to observe.

Fertilizer Plant:

I did not observe the L.P. fueled drum dryer, for which a permit modification has already been submitted. This equipment is not on the current permit, and I made no attempt to observe at this time.

- Total unpermitted fuel burning equipment actually observed and verified as delineated above: 5,182,000 btu/hr.
- The permit has no current L.P. fuel-burning permit conditions.
- No L.P. fuel burning equipment > 10 million btu/hr observed.
- I informed Mr. Ruiz the facility is in violation of the failure to submit a minor-modification to the permit prior to installing respective equipment.

REQUIRED CORRECTIVE ACTION: [Rule 200 Section 403.2]

- Submit minor-modification for addition of all fuel-burning equipment 300,000 btu/hr or greater to the permit.
- Include the applicable fuel-burning equipment not observed in the North facility.
- I suggest including a list of all fuel-burning equipment > 125,000 input btu/hr based on suggestion from Permitting Supervisor, Todd Martin.
- Per Permitting Supervisor, Todd Martin, it is sufficient to add the above equipment to the current pending minor-modification.

AREA OF CONCERN: [Rule 200 Section 403.2]

- Mr. Ruiz stated emergency generators G-39, and G-42 replaced generators G-3 and G-4 respectively.
- Mr. Ruiz stated generator G-3 was relocated to Jackrabbit office, and G-4 was relocated to new maintenance facility under construction and part of Permit 040136, to be installed later.
- New generators G-43 and G-44 were observed on site, but not yet connected to electrical cables to provide emergency power to the facility.
- Include Emergency generators G-4, G-43, and G-44, to the minor modification prior to installation at this particular facility.
- I recommend complete list of emergency generator data be submitted along with minor-modification documents to alleviate confusion by the replacement of G-4 and its subsequent re-installation at the facility.

DISPOSITION:

On March 14, 2016; 0740 hrs - 1015 hrs; I conducted the re-inspection arranged with Mr. Ruiz for the purposes of verifying the required corrective actions have been conducted. This re-inspection was conducted with two continued inspections consecutive to this one in which I traveled to the source's Jackrabbit Trail office and returned.

I was accompanied by Inspector Supervisor, Bryan Mandalfino.

I met on site with the following persons during the re-inspection:

- Frank Ruiz, Safety
- Shari Yeatts, Compliance Director
- David Doyal Goss, Maintenance Supervisor

0740 hrs to 1015 hrs: Arlington Facility:

I verified all of the required corrective actions have been completed for the particular violations issued; but one area of concern was discovered during my on-site review of maintenance records for emergency generator G-2 which follows:

AREA OF CONCERN:

Emergency generator G-2 preventative maintenance log for 16-May-2015 evidences an hour reset had occurred prior to commencement of this maintenance. Mr. Ruiz explained an EPROM error "Code 25" was displayed and logged, but the proximate cause of the error was unknown and did not occur concurrent with any maintenance (It was present at start of logged maintenance on 16-May-2015).

Albeit I was able to deduce the expended hours with the data in front of me, I informed Mr. Ruiz there is a necessary protocol that is required to be met when this occurs. I arranged to research and include in this report as follows:

- Permanently log the date of reset and the last known engine hours prior to reset on the engine's control panel as an "offset" for future log entries.
- Log both the visible hourly reading and the offset on future logs entries for this particular generator set.

Comments

Another area of concern was discovered as Ms. Yeatts informed me of the facility's plans to construct a new protein plant, which will be used for animal processing.

I informed Ms. Yeatts of my concern this may require permitting, but would research this. My area of concern follows:

AREA OF CONCERN: [Rule 220 Subsection 405.3]

Construction of a protein plant applicable to Rule 320 Subsection 301, and has the potential to generate VOC's during the animal processing.

I spoke to Permit Engineer, Sara Seuberling who stated no permit modification has been requested for this potential source of air pollution. Ms. Seuberling's opinion was this source requires a non-minor modification subject to Rule 220 Subsection 405.3.

On March 24, 2016; I telephoned Ms. Yeatts and informed her of my research and strongly suggested submittal of a request for non-minor modification of the source's permit. Ms. Yeatts requested what I told her via email so she could immediately address this.

I emailed Ms. Yeatts summarizing my findings a request for non-minor modification is due prior to commencing operation of the protein plant.

1130 hrs to 1215 hrs: Inspection-continued: Jackrabbit Trail Facility's Maintenance office:

I completed verification of maintenance records, verifying corrective actions completed. Source does annual oil analysis, which Mr. Goss states is not used for determining whether oil change is needed -- because oil changes are completed annually regardless. Mr. Goss explained the soot content in the oil analysis is used to determine whether the air cleaner requires filter replacement.

1245 hrs to 1310 hrs: Inspection continued: Arlington Facility (South). I rescinded a particular violation regarding observed ventilation on the facility's above ground gasoline storage tank which I found at this time to have no merit. An Inspection Report Correction Notice and the original Inspection report dated 20-Nov-2015 documented the details of which will not be found in this report.

All noted violations have been verified corrected.

End report.

Documents used to determine compliance while on-site:

1) On site records

Additional documents associated with this inspection report:

1) Field notes

2) Inspection photos

3)Email correspondence

Delivery Method:

Date: 24-Mar-16

Regular Mail

OFFICE USE

rec:

rev:



Maricopa County

Air Quality Department

Compliance Division
1001 North Central, Ste. 125
Phoenix, Arizona 85004
Phone: (602) 506-6010
Fax: (602) 506-2537

INSPECTION REPORT CORRECTION NOTICE

Permit Holder

Hickman's Egg Ranch, Inc.

Permit Number

040136

Enclosed is a photocopy of your inspection report conducted on :

Nov 20, 2015

The following corrections were made to inspection report

735371

Revision Date :

Mar 17, 2016

Reviewed By:

Bryan Mandalfino

☒ Reviewed

Rescind violation for 40 CFR 63.11116(a). Observed on 14-Mar-2016 vent present on Aboveground Storage Tank (AST) is solely for ventilation of outer wall of double-walled AST -- no vapor leak suspected.

Both violation notation in header, and violation narrative in comments removed.

If you have any questions regarding this matters, please contact me at :

602-527-5288

Inspector, Shannon Klimek #92

Compliance & Enforcement Division
Maricopa County Air Quality Department
www.maricopa.gov/aq



Maricopa County

Air Quality Department

Compliance Division 1001
North Central Ave., Suite
125 Phoenix, Arizona
85004 Phone:
602-506-6010
Fax: 602-506-2163

Dear Responsible Party:

RE: Violation Notice

On Nov 20, 2015, an inspection of your site/facility was conducted. This letter is conveying to you a notice that a violation of Maricopa County Air Quality Rules was identified during or originating from that inspection. The notice provides you with an explanation of basis for the violation.

The current status of any violations listed on the Violation can be tracked online at the following address: http://www.maricopa.gov/aq/divisions/enforcement/nov/nov_status.aspx
If access to the internet is unavailable, please call 602.506.6734 to obtain the status of the violation(s).

Should you wish to respond in any way to this violation, written correspondence regarding this violation should be sent so that it is received within 10 business days from the date of this notice. Please include the permit/notification/parcel and violation numbers in your written correspondence.

If you believe the basis of the violation is not accurate and no violation occurred, the department offers an opportunity to request a review of the inspection findings. A formal request for review must be made within 10 business days of receipt of this violation. The written request should provide sufficient information to allow the department to make an informed and objective assessment and recommendation regarding the issues raised in defense. A request for a review must include the identifying number of the Notice of Violation. You may submit a request by letter, completing the online form at <http://www.maricopa.gov/aq/divisions/Ombudsman/Default.aspx> or by e-mail:

Business Assistance Coordinator
Maricopa County Air Quality Department
1001 N. Central Ave., Suite 125
Phoenix, AZ 85004
AQbusinessassistance@mail.maricopa.gov
(602) 506-5102

Upon re-inspection, a Disposition Statement will be prepared indicating whether a violation was corrected. In most cases, a Notice of Violation (NOV) will be referred for formal enforcement. A Referral Report is prepared which becomes part of the formal record and often contains additional information regarding the specifics of the violation. Copies inspection, disposition and referral package will be sent to you during the enforcement process.

On the reverse side of this letter is a list of acronyms and policies related to inspections, our rules and our enforcement process. Further information about the Maricopa County Air Quality Department's rules can be found on the department's website, www.maricopa.gov/aq.

Additional information about how to improve air quality in Maricopa County can be found at www.CleanAirMakeMore.com

If you have any questions regarding this notice, you may contact the inspector listed on the inspection form (upper right corner) or an inspector supervisor at (602) 506-6734. Thank you for your attention to this matter.

Thank you,
Air Quality Compliance Division
602-506-6734

Acronyms used in the Inspection Report		
≤ – Less than or equal to	CM – Certified Mail	NTV – Non Title V
≥ – Greater than or equal to	COMS – Continuous Opacity Monitoring System	O&M Plan – Operations and Maintenance Plan
AAP – Area Accessible to the Public	DCP – Dust Control Plan	PC – Permit Condition
ACWM – Asbestos Containing Waste Material	DGO – Dust Generating Operation	RACM – Regulated Asbestos Containing Material
ASHARA – Asbestos School Hazard Abatement Reauthorization Act	ECS – Emissions Control System	RM – Regular Mail
AHERA – Asbestos Hazard Emergency Response Act	HAP – Hazardous Air Pollutant	Stab. – Stabilize
ATI – At the time of inspection	HAPRACT – Hazardous Air Pollutant Reasonable Available Control Technology	TO – Track Out
AZMACT – Arizona Maximum Achievable Control Technology	HT – Haul Truck	TOCD – Track Out Control Device
CARB – California Air Resource Board	N/A – Not Applicable	VEE – Visible Emissions Evaluation
CEMS – Continuous Emission Monitoring System	N/O – Not Observed	VOC – Volatile Organic Compound

OTC - OPPORTUNITY TO CORRECT: You are hereby notified that you **must** correct the violation(s) of Maricopa County Air Pollution Control Regulations or the specific condition(s) of your air quality permit as indicated on the Violation Notice **immediately**. Failure to correct the condition(s) **immediately** can result in an NOV.

NOV - NOTICE OF VIOLATION: You are hereby notified that you are **in violation** of the Maricopa County Air Pollution Control Regulations or specific condition(s) of your air quality permit as indicated on the Violation Notice. **The violation(s) must be corrected immediately. All notices of violation are referred to the Maricopa County Air Quality Department Enforcement Division or the Maricopa County Attorney for further enforcement action.**

WARNING NOTICE: A Warning Notice which by rule or ordinance requires a period of time to correct a deficiency or to notify the department. A Warning Notice is not referred for penalties but subsequent violation will be assessed penalties.

The owner/operator is ultimately responsible for maintaining the site/facility in compliance with Maricopa County rules and regulations at all times.

INSPECTION REPORT-VIOLATION

735371



Maricopa County Air Quality Department
1001 N. Central Avenue, Suite 125
Phoenix, AZ 85004
Phone: (602) 506-6010 Fax: (602) 506-2537
www.maricopa.gov/aq

Date: 20-Nov-15
Start Time: 0815 hrs End Time: 1300 hrs
Inspector: Shannon Klimek #92
Phone: 602.527.6288
Email: KlimekS@mail.maricopa.gov

Permit Number:

040136

Hickman's Egg Ranch, Inc.

6515 S. Jackrabbit Trail

Buckeye

AZ 85326

Inspection Result:

In Violation

Inspection Type: Detail inspection On-site

Inspection Purpose: Routine

Site Name: Hickman's Family Farms (Arlington)

Site Contact: Francisco Ruiz, Safety Director

Site Address:
32425 W. Salome Hwy.

City:
Arlington, AZ

Phone: 623.872.2341
Inspection Rights Notification:
Read and Signed Rights

ALL VIOLATIONS MUST BE CORRECTED IMMEDIATELY.



RULE	SECTION	VIOLATION TYPE	PC/STATUTE	DESCRIPTION	HPV
370	302.98	NOV	p.c. 11.c.	Owner/operator shall conduct preventative maintenance recommended by the manufacturer	<input type="checkbox"/>

Specifically: 40 CFR 63.6603(a) Table 2d(4): Emergency generator engines G-2 through G-9 on site have not received required maintenance. Details in comments.

Disposition Date/Time: Disposition Status:

Disposition Comments:

RULE	SECTION	VIOLATION TYPE	PC/STATUTE	DESCRIPTION	HPV
360	301.97	NOV	p.c. 12.d.	Owner/operator shall conduct preventative maintenance recommended by the manufacturer	<input type="checkbox"/>

Specifically: 40 CFR 60.4211(a): Emergency generator engines G-1; G-10 through G-25; and FM-1 on site have not received manufacture recommended maintenance. Details in comments.

Disposition Date/Time: Disposition Status:

Disposition Comments:

RULE	SECTION	VIOLATION TYPE	PC/STATUTE	DESCRIPTION	HPV
220	302.7	OTC	p.c. 13.c.	Keep copies of all reports required by the permit.	<input type="checkbox"/>

Specifically: Manufacturer's written instructions et al. for the emergency engines G-1 through G-25, and FM-1 were not kept on-site.

Disposition Date/Time: Disposition Status:

Disposition Comments:

RULE	SECTION	VIOLATION TYPE	PC/STATUTE	DESCRIPTION	HPV
353	302.2a	NOV		The fill pipe cap shall have a securely attached, intact gasket	<input type="checkbox"/>

Specifically: The gasoline storage tank fill pipe cap did not have a gasket.

Disposition Date/Time: Disposition Status:

Disposition Comments:

RULE	SECTION	VIOLATION TYPE	PC/STATUTE	DESCRIPTION	HPV
220	403.2	OTC		Changes at a source with a Non-Title V permit shall require a permit revision	<input type="checkbox"/>

Specifically: Greater than 300,000 btu/hr liquid propane fuel-burning equipment totaling 5,182,000 btu/hr observed in use at South Plant. North Plant not scrutinized at this time. No fuel-burning activities currently delineated in permit.

Disposition Date/Time: Disposition Status:

Disposition Comments:

Comments

FILE REVIEW of permit using Revision 2.0.1.0.

Permit status: ISSUED

Previous inspection history: NOV 723877 - R200 S301 - Failure to obtain permit or permit revision Discovery: 31-Jan-2011

NOV 732956 - R314 S301 - Unlawful open burning Discovery: 07-Mar-2014

Prior inspection reports: Last Inspection : 28-Mar-2013: (Incomplete)

Next Last Inspection: 21-Jan-2011: (See violation 723877 above)

Operating parameters: Rule 320 (Hydrogen Sulfide); Rule 324 (Emergency Engines); Rule 353 (Gasoline Non-resale)

Miscellaneous:

- Crematory allegedly disconnected. (Rule 313)
- Mulching and Fertilizer piles to be scrutinized for burning (Rule 314)
- No Dust Control Plan required as operation is A.R.S. § 49-457 exempt.
- No O&M Plan required because there are no applicable ECS.
- Permit Mod pending to remove Feed Milling from permit due to potential A.R.S. § 49-457 exemption.
- Permit conditions for Fuel Burning associated with drum dryer's fertilizer processing not delineated in conditions yet. (Rule 323)

Performance testing requirements: Compliance demonstration for Hydrogen Sulfide

Emissions limits: n/a

Annual fee: Current

INSPECTION:

I conducted a routine inspection to verify compliance with Permit 040136 Revision 2.0.1.0.

I met on site with Compliance Manager, Shari Yeatts, and Safety and Health Coordinator, Frank Ruiz and explained the purpose of the inspection:

I was initially accompanied by Permitting Engineers, Li Sa Kon; Sara Seuberling; and Michael Sonenburg; but they opted to accompany Ms. Yeatts while Mr. Ruiz accompanied me for the duration of the inspection.

I photographed some of my observations.

Crematory:

Equipment not connected to a fuel source or process.

Mulching Operations:

No burning mulch material observed during scrutiny.

Odor Control:

No strong odors observed. No records requested due to my familiarity and observation of compliance with occasional Hydrogen Sulfide reports requested by Department throughout 2015.

Emergency Engines:

I visually inspected and photographed each of the emergency engines throughout the facility, noting make, model, serial number, current engine hours, BHP, and for some; the dates of the most recent oil-filter changes.

VIOLATION: [Rule 370 Section 302.98; p.c. 11.c.]

Failure to perform manufacturer scheduled maintenance on emergency generators, observed as follows:

- G-2 to G-9 Total of 8 generators.
 - Maintenance records unavailable for past 5 years.
- Mr. Ruiz provided me with total of 7 maintenance log entries for August 2014 oil changes for 5 of the 8 generators. Prior records were not provided.
- Mr. Ruiz stated:
 - The facility's Shop Manager left in 2013.
 - The current Shop Manager commenced in late 2014.
 - Prior logs not located and consequently could not be provided.
- Last inspection conducted in which compliance was verified by Department: 21-Jan-2011.
- I informed Mr. Ruiz this is an NOV violation.

REQUIRED CORRECTIVE ACTION: [Rule 370 Section 302.98; p.c. 11.c.]

Conduct all inspections and maintenance required per 40 CFR 63.6603(a) Table 2d(4) for each of the 8 generators delineated in permit condition 11 (i.e. G-2 through G-9) for which most recent required log entry has not been provided since the respective generator's installation; then submit to the Department as follows:

- Generators G-2 though G-9: [Total of 8 generators.]

- Oil and Filter change or oil analysis results, date of change, and corresponding hours on the hour meter.
 - Inspection of air cleaner, date of inspection, and replacement date if replaced.
 - Inspection of all hoses and belts, date of inspection, and replacement date if replaced.
 - Submit to the Department the above delineated log entries within 14 business days of receipt of this report.
- [NOTE: Conduct required inspections and maintenance regularly following submittal.]

VIOLATION: [Rule 360 Section 301.97; p.c. 12.d.]

Failure to perform manufacturer scheduled maintenance on emergency generators, observed as follows:

- G-1; G-10 through G-25; and FM-1; Total of 18 generators.
 - Maintenance records unavailable for past 5 years.
 - Maintenance records unavailable for G-20, G-21, G-22; and FM-1 since installation in 2012.
 - Maintenance records unavailable for G-23; G-24; and G-25 since installation in 2014.
- Mr. Ruiz provided me with total of 2 maintenance log entries for Aug 2014 oil changes for 2 of the 18 generators. Prior records were not provided.
- Mr. Ruiz stated:
 - The facility's Shop Manager left in 2013.
 - The current Shop Manager commenced in late 2014.
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- Last inspection conducted in which compliance was verified by Department: 21-Jan-2011.
- I informed Mr. Ruiz this is an NOV violation.

REQUIRED CORRECTIVE ACTION: [Rule 360 Section 301.97; p.c. 12.d.]

Conduct all inspections and maintenance required for each particular generator for which most recent required log entry has not been provided since the respective generator's installation; then submit to the Department as follows:

- For emergency generator: G-1; G-10; G-11; G-20 through G-25; and FM-1; Total of 10 generators:
 - All items within attached maintenance schedule: CUMMINS / ONAN POWER GENERATION MAINTENANCE GUIDELINES --This is the document Mr. Ruiz provided me via email on 15-Dec-2015 to prove compliance with permit condition 13.c.;
 - OR, Comply with 40 CFR 60.4211(g)(2) summarized as follows:
 - Keep a maintenance plan and records of conducted maintenance and must, to the extent practicable, maintain and operate the engine in a manner consistent with good air pollution control practice for minimizing emissions.
 - In addition, you must conduct an initial performance test to demonstrate compliance within 1 year after an engine and control device is no longer installed, configured, operated, and maintained in accordance with the manufacturer's emission-related written instructions.
- For emergency generators: G-13, G-14; G-16 through G-19; Total of 6 generators:
 - All items within attached maintenance schedule: POWERTECH PLUS 9.0L 6090HF485 Tier III/Stage IIIA OEM DIESEL ENGINES --This is the document Mr. Ruiz provided me via email on 15-Dec-2015 to prove compliance with permit condition 13.c.;
 - OR, Comply with 40 CFR 60.4211(g)(2) summarized as follows:
 - Keep a maintenance plan and records of conducted maintenance and must, to the extent practicable, maintain and operate the engine in a manner consistent with good air pollution control practice for minimizing emissions.
 - In addition, you must conduct an initial performance test to demonstrate compliance within 1 year after an engine and control device is no longer installed, configured, operated, and maintained in accordance with the manufacturer's emission-related written instructions.
- For emergency generator: G-12
 - All items within attached maintenance schedule: Detroit Diesel Series 60 Engine Operator's Guide, Serial Number 162036. This is the document Mr. Ruiz provided me via email on 13-Jan-2016 to prove compliance with permit condition 13.c.;
- For emergency generator: G-15
 - All items within attached maintenance schedule: Katolight (Owner Manual) Serial Number 161491. This is the document Mr. Ruiz provided me via email on 13-Jan-2016 to prove compliance with permit condition 13.c.;

[NOTE: Conduct required inspections and maintenance regularly following submittal.]

VIOLATION: [Rule 220 Section 302.7; p.c. 13.c.;]

- During on-site inspection, Mr. Ruiz stated the Owner's Manuals are maintained at Jackrabbit Office but did not know where they were anymore because the office where it was kept was re-purposed but arranged to locate the owner manuals and email me excerpt's for each respective engine manufacturer's recommended Inspection and Maintenance schedule to prove the manuals were present.
- I explained to Mr. Ruiz this is a failure to maintain an on-site copy and I was issuing an OTC violation which will be resolved by the submittal of the arranged excerpts.
- Record submittal pushed back at Mr. Ruiz's request until December 7, 2015.
- On December 15, 2015; Mr. Ruiz submitted the Manufacturer's Recommended Inspection and Maintenance excerpts excluding unit G-12 and G-15.
- On January 8, 2016; upon review of documents, I emailed Mr. Ruiz informing him I was still waiting on the owners manual's manufacturer recommended inspection and maintenance schedules for unit G-12 and G-15.

- On January 13, 2016; Mr. Ruiz submitted the owner manuals excerpts for units G-12 and G-15.

REQUIRED CORRECTIVE ACTION: [Rule 220 Section 302.7; p.c. 13.c.]

- Obtain and maintain an on-site copy of the manufacturer's written instructions.
- Provide the requested documents promptly for verification and disposition of this OTC.

AREA OF CONCERN: [Rule 324 Section 502.4; p.c. 13.a.]

Failure to keep a monthly record of engine hours of operation, for the purpose of a 12-month rolling record of engine hours as follows:

- G-12 through G-19 [Total of 8 generators.]
- Mr. Ruiz submitted a log of engine hours for the total number of engine hours each respective generator ran for a particular calendar year, for Nov/Dec 2011, calendar years 2012 through 2015.
- Violation based upon generator hours records provided for G-12 through G-19 on November 2011 and December 2011; which state, "unknown" quantity of hours.
On December 7, 2015; I telephoned Mr. Ruiz and explained the requirement to keep a record of the rolling 12-month engine hours. I explained to Mr. Ruiz this is not a record of the calendar year hours. Mr. Ruiz explained the non-compliance was inadvertent; and he is becoming increasingly more proficient with compliance as he learns.
- Number of hours on engine raises no concerns about exceeding allowable engine hours as quantities are very low; and I have observed improvements in record keeping of logging process for readiness and testing hours, evidenced by log sheets kept inside housing of most generators; and also evidenced by distinctions of hour logged since 2014.
- SUGGESTION: Going forward, keep records of data required for a 12-month rolling total of engine hours, for each engine. These should be presented as rolling 12-mo totals i.e. 12 monthly totals where if period requested if more than 12 consecutive months, then each consecutive 12 months has a separate 12-mo rolling total.

Gasoline Storage and Dispensing:

I observed the following:

- Facility has an above-ground 500-gallon gasoline above-ground storage tank located at the South Plant.
- There is no spill containment.
- There is no Stage I vapor recovery connection.
- The vent pipe on the tank has a double outlet vent device installed at the tip. No pressure/vacuum valve is installed on vent pipe.
- The tank already has two pressure vents installed on the top of the tank.
- Unknown tank manufacture date....not delineated in any prior permit applications, permit mod applications, TSD's, et al.
- Rule 353 Section 305.1 exemption to Farm Tanks is less stringent than 40 CFR 63.11116(a). Necessarily, the more stringent of the two regulations is applicable.
- Throughput records provided by Mr. Ruiz show a monthly throughput less than 10,000 gal/mo. The highest month noted for the period Nov-2014 though Oct-2015 was for the month of July-2015 at 2,317 gal.

VIOLATION: [Rule 353 Section 302.2 a.]

- Threaded and domed solid metal fill pipe cap, no gasket.
- I photographed this observation.
- I informed Mr. Ruiz I was issuing a NOV for the failure to have gasket on the fill pipe cap and suggested a gasket be installed immediately.
- Mr. Ruiz responded immediately by ordering the facility maintenance personnel to install a gasket on the fill pipe cap.
- On February 1, 2016; I telephoned Mr. Ruiz and reviewed the violation and corrective action required; Mr. Ruiz stated the gasket was placed on the fill pipe cap the date of inspection. I informed I would necessarily return to verify during Disposition inspection.

REQUIRED CORRECTIVE ACTION: [Rule 353 Section 302.2 a.]

- Install gasket on fill pipe cap.

Inspection observations of unpermitted activity i.e. Fuel Burning:

VIOLATION: [Rule 200 Section 403.2]

Unpermitted L.P. (liquid propane) fuel burning equipment observed installed and in active use at facility as follows:

South Plant:

West Boiler: 1,210,000 btu/hr
East Boiler: 1,460,000 btu/hr
Water heater #112: 1,256,000 btu/hr
Water heater #113: 1,256,000 btu/hr

North Plant:

Mr. Ruiz stated additional fuel burning equipment were present ancillary to North Plant, but I did not have opportunity to observe.

Fertilizer Plant:

I did not observe the L.P. fueled drum dryer, for which a permit modification has already been submitted. This equipment is not on the current permit, and I made no attempt to observe at this time.

- Total unpermitted fuel burning equipment actually observed and verified as delineated above: 5,182,000 btu/hr.
- The permit has no current L.P. fuel-burning permit conditions.
- No L.P. fuel burning equipment > 10 million btu/hr observed.
- I informed Mr. Ruiz the facility is in violation of the failure to submit a minor-modification to the permit prior to installing respective equipment.

REQUIRED CORRECTIVE ACTION: [Rule 200 Section 403.2]

- Submit minor-modification for addition of all fuel-burning equipment 300,000 btu/hr or greater to the permit.
- Include the applicable fuel-burning equipment not observed in the North facility.
- I suggest including a list of all fuel-burning equipment > 125,000 input btu/hr based on suggestion from Permitting Supervisor, Todd Martin.
- Per Permitting Supervisor, Todd Martin, it is sufficient to add the above equipment to the current pending minor-modification.

AREA OF CONCERN: [Rule 200 Section 403.2]

- Mr. Ruiz stated emergency generators G-39, and G-42 replaced generators G-3 and G-4 respectively.
- Mr. Ruiz stated generator G-3 was relocated to Jackrabbit office, and G-4 was relocated to new maintenance facility under construction and part of Permit 040136, to be installed later.
- New generators G-43 and G-44 were observed on site, but not yet connected to electrical cables to provide emergency power to the facility.
- Include Emergency generators G-4, G-43, and G-44, to the minor modification prior to installation at this particular facility.
- I recommend complete list of emergency generator data be submitted along with minor-modification documents to alleviate confusion by the replacement of G-4 and its subsequent re-installation at the facility.

End report.

Documents used to determine compliance while on-site:

1) On site records

Additional documents associated with this inspection report:

- 1) Field notes
- 2) Internal mail correspondence
- 3) External email correspondence with documents attached
- 4) CUMMINS / ONAN POWER GENERATION MAINTENANCE GUIDELINES maintenance schedule
- 5) POWERTECH PLUS 9.0L 6090HF485 Tier III/Stage IIIA OEM DIESEL ENGINES maintenance schedule
- 6) Detroit Diesel Series 60 Engine Operator's Guide, Serial Number 162036 maintenance schedule
- 7) Katolight (Owner Manual) Serial Number 161491 maintenance schedule
- 8) Inspection photos

If this section has been completed, the original Inspection Report/Violation Notice has been revised. See the attached Inspection Report Correction Notice for details.

Revised by: Shannon Klimek #92

Revised Date: 17-Mar-16

Mailed Date: 24-Mar-16

Delivery Method: Regular Mail

Delivery Method: Date: 12-Feb-16

Regular Mail

OFFICE USE

rec:

rev:



Maricopa County

Air Quality Department

Compliance Division 1001
North Central Ave., Suite
125 Phoenix, Arizona
85004 Phone:
602-506-6010
Fax: 602-506-2163

Dear Responsible Party:

RE: Violation Notice

On Nov 20, 2015, an inspection of your site/facility was conducted. This letter is conveying to you a notice that a violation of Maricopa County Air Quality Rules was identified during or originating from that inspection. The notice provides you with an explanation of basis for the violation.

The current status of any violations listed on the Violation can be tracked online at the following address: http://www.maricopa.gov/aq/divisions/enforcement/nov/nov_status.aspx
If access to the internet is unavailable, please call 602.506.6734 to obtain the status of the violation(s).

Should you wish to respond in any way to this violation, written correspondence regarding this violation should be sent so that it is received within 10 business days from the date of this notice. Please include the permit/notification/parcel and violation numbers in your written correspondence.

If you believe the basis of the violation is not accurate and no violation occurred, the department offers an opportunity to request a review of the inspection findings. A formal request for review must be made within 10 business days of receipt of this violation. The written request should provide sufficient information to allow the department to make an informed and objective assessment and recommendation regarding the issues raised in defense. A request for a review must include the identifying number of the Notice of Violation. You may submit a request by letter, completing the online form at <http://www.maricopa.gov/aq/divisions/Ombudsman/Default.aspx> or by e-mail:

Business Assistance Coordinator
Maricopa County Air Quality Department
1001 N. Central Ave., Suite 125
Phoenix, AZ 85004
AQbusinessassistance@mail.maricopa.gov
(602) 506-5102

Upon re-inspection, a Disposition Statement will be prepared indicating whether a violation was corrected. In most cases, a Notice of Violation (NOV) will be referred for formal enforcement. A Referral Report is prepared which becomes part of the formal record and often contains additional information regarding the specifics of the violation. Copies inspection, disposition and referral package will be sent to you during the enforcement process.

On the reverse side of this letter is a list of acronyms and policies related to inspections, our rules and our enforcement process. Further information about the Maricopa County Air Quality Department's rules can be found on the department's website, www.maricopa.gov/aq.

Additional information about how to improve air quality in Maricopa County can be found at www.CleanAirMakeMore.com

If you have any questions regarding this notice, you may contact the inspector listed on the inspection form (upper right corner) or an inspector supervisor at (602) 506-6734. Thank you for your attention to this matter.

Thank you,
Air Quality Compliance Division
602-506-6734

Acronyms used in the Inspection Report		
≤ – Less than or equal to	CM – Certified Mail	NTV – Non Title V
≥ – Greater than or equal to	COMS – Continuous Opacity Monitoring System	O&M Plan – Operations and Maintenance Plan
AAP – Area Accessible to the Public	DCP – Dust Control Plan	PC – Permit Condition
ACWM – Asbestos Containing Waste Material	DGO – Dust Generating Operation	RACM – Regulated Asbestos Containing Material
ASHARA – Asbestos School Hazard Abatement Reauthorization Act	ECS – Emissions Control System	RM – Regular Mail
AHERA – Asbestos Hazard Emergency Response Act	HAP – Hazardous Air Pollutant	Stab. – Stabilize
ATI – At the time of inspection	HAPRACT – Hazardous Air Pollutant Reasonable Available Control Technology	TO – Track Out
AZMACT – Arizona Maximum Achievable Control Technology	HT – Haul Truck	TOCD – Track Out Control Device
CARB – California Air Resource Board	N/A – Not Applicable	VEE – Visible Emissions Evaluation
CEMS – Continuous Emission Monitoring System	N/O – Not Observed	VOC – Volatile Organic Compound

OTC - OPPORTUNITY TO CORRECT: You are hereby notified that you **must** correct the violation(s) of Maricopa County Air Pollution Control Regulations or the specific condition(s) of your air quality permit as indicated on the Violation Notice **immediately**. Failure to correct the condition(s) **immediately** can result in an NOV.

NOV - NOTICE OF VIOLATION: You are hereby notified that you are **in violation** of the Maricopa County Air Pollution Control Regulations or specific condition(s) of your air quality permit as indicated on the Violation Notice. **The violation(s) must be corrected immediately. All notices of violation are referred to the Maricopa County Air Quality Department Enforcement Division or the Maricopa County Attorney for further enforcement action.**

WARNING NOTICE: A Warning Notice which by rule or ordinance requires a period of time to correct a deficiency or to notify the department. A Warning Notice is not referred for penalties but subsequent violation will be assessed penalties.

The owner/operator is ultimately responsible for maintaining the site/facility in compliance with Maricopa County rules and regulations at all times.

INSPECTION REPORT-VIOLATION

735371



Maricopa County Air Quality Department
1001 N. Central Avenue, Suite 125
Phoenix, AZ 85004
Phone: (602) 506-6010 Fax: (602) 506-2537
www.maricopa.gov/aq

Date: 20-Nov-15
Start Time: 0815 hrs End Time: 1300 hrs
Inspector: Shannon Klimek #92
Phone: 602.527.6288
Email: KlimekS@mail.maricopa.gov

Inspection Result:

In Violation

Inspection Type: Detail inspection On-site

Inspection Purpose: Routine

Permit Number:

040136

Hickman's Egg Ranch, Inc.

6515 S. Jackrabbit Trail

Buckeye

AZ 85326

Site Name: Hickman's Family Farms (Arlington)

Site Contact: Francisco Ruiz, Safety Director

Site Address:
32425 W. Salome Hwy.

City:
Arlington, AZ

Phone: 623.872.2341
Inspection Rights Notification:
Read and Signed Rights

ALL VIOLATIONS MUST BE CORRECTED IMMEDIATELY.



RULE	SECTION	VIOLATION TYPE	PC/STATUTE	DESCRIPTION	HPV
370	302.98	NOV	p.c. 11.c.	Owner/operator shall conduct preventative maintenance recommended by the manufacturer	<input type="checkbox"/>

Specifically: 40 CFR 63.6603(a) Table 2d(4): Emergency generator engines G-2 through G-9 on site have not received required maintenance. Details in comments.

Disposition Date/Time: Disposition Status:

Disposition Comments:

RULE	SECTION	VIOLATION TYPE	PC/STATUTE	DESCRIPTION	HPV
360	301.97	NOV	p.c. 12.d.	Owner/operator shall conduct preventative maintenance recommended by the manufacturer	<input type="checkbox"/>

Specifically: 40 CFR 60.4211(a): Emergency generator engines G-1; G-10 through G-25; and FM-1 on site have not received manufacture recommended maintenance. Details in comments.

Disposition Date/Time: Disposition Status:

Disposition Comments:

RULE	SECTION	VIOLATION TYPE	PC/STATUTE	DESCRIPTION	HPV
220	302.7	OTC	p.c. 13.c.	Keep copies of all reports required by the permit.	<input type="checkbox"/>

Specifically: Manufacturer's written instructions et al. for the emergency engines G-1 through G-25, and FM-1 were not kept on-site.

Disposition Date/Time: Disposition Status:

Disposition Comments:

RULE	SECTION	VIOLATION TYPE	PC/STATUTE	DESCRIPTION	HPV
353	302.2a	NOV		The fill pipe cap shall have a securely attached, intact gasket	<input type="checkbox"/>

Specifically: The gasoline storage tank fill pipe cap did not have a gasket.

Disposition Date/Time: Disposition Status:

Disposition Comments:

RULE	SECTION	VIOLATION TYPE	PC/STATUTE	DESCRIPTION	HPV
		OTC	40 CFR 63.11116(a)	Gasoline vapor release to atmosphere for extended periods of time not allowed.	<input type="checkbox"/>

Specifically: The vent pipe rising from the storage tank was equipped with a double outlet vent device. This would allow vapor to escape unimpeded from the tank.

Disposition Date/Time: Disposition Status:

Disposition Comments:

RULE	SECTION	VIOLATION TYPE	PC/STATUTE	DESCRIPTION	HPV
220	403.2	OTC		Changes at a source with a Non-Title V permit shall require a permit revision	<input type="checkbox"/>

Specifically:

Greater than 300,000 btu/hr liquid propane fuel-burning equipment totaling 5,182,000 btu/hr observed in use at South Plant. North Plant not scrutinized at this time. No fuel-burning activities currently delineated in permit.

Disposition Date/Time:

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Comments

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Previous inspection history: NOV 723877 - R200 S301 - Failure to obtain permit or permit revision Discovery: 31-Jan-2011

NOV 732956 - R314 S301 - Unlawful open burning Discovery: 07-Mar-2014

Prior inspection reports: Last Inspection : 28-Mar-2013: (Incomplete)

Next Last Inspection: 21-Jan-2011: (See violation 723877 above)

Operating parameters: Rule 320 (Hydrogen Sulfide); Rule 324 (Emergency Engines); Rule 353 (Gasoline Non-resale)

Miscellaneous:

- Crematory allegedly disconnected. (Rule 313)
- Mulching and Fertilizer piles to be scrutinized for burning (Rule 314)
- No Dust Control Plan required as operation is A.R.S. § 49-457 exempt.
- No O&M Plan required because there are no applicable ECS.
- Permit Mod pending to remove Feed Milling from permit due to potential A.R.S. § 49-457 exemption.
- Permit conditions for Fuel Burning associated with drum dryer's fertilizer processing not delineated in conditions yet. (Rule 323)

Performance testing requirements: Compliance demonstration for Hydrogen Sulfide

Emissions limits: n/a

Annual fee: Current

INSPECTION:

I conducted a routine inspection to verify compliance with Permit 040136 Revision 2.0.1.0.

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I was initially accompanied by Permitting Engineers, Li Sa Kon; Sara Seuberling; and Michael Sonenburg; but they opted to accompany Ms. Yeatts while Mr. Ruiz accompanied me for the duration of the inspection.

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Equipment not connected to a fuel source or process.

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No burning mulch material observed during scrutiny.

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I visually inspected and photographed each of the emergency engines throughout the facility, noting make, model, serial number, current engine hours, BHP, and for some; the dates of the most recent oil-filter changes.

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 - The current Shop Manager commenced in late 2014.
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- Last inspection conducted in which compliance was verified by Department: 21-Jan-2011.
- I informed Mr. Ruiz this is an NOV violation.

REQUIRED CORRECTIVE ACTION: [Rule 370 Section 302.98; p.c. 11.c.]

Conduct all inspections and maintenance required per 40 CFR 63.6603(a) Table 2d(4) for each of the 8 generators delineated in permit condition 11 (i.e. G-2 through G-9) for which most recent required log entry has not been provided since the respective generator's installation; then submit to the Department as follows:

- Generators G-2 through G-9: [Total of 8 generators.]
 - Oil and Filter change or oil analysis results, date of change, and corresponding hours on the hour meter.
 - Inspection of air cleaner, date of inspection, and replacement date if replaced.
 - Inspection of all hoses and belts, date of inspection, and replacement date if replaced.
 - Submit to the Department the above delineated log entries within 14 business days of receipt of this report.

[NOTE: Conduct required inspections and maintenance regularly following submittal.]

VIOLATION: [Rule 360 Section 301.97; p.c. 12.d.]

Failure to perform manufacturer scheduled maintenance on emergency generators, observed as follows:

- G-1; G-10 through G-25; and FM-1; Total of 18 generators.
 - Maintenance records unavailable for past 5 years.
 - Maintenance records unavailable for G-20, G-21, G-22; and FM-1 since installation in 2012.
 - Maintenance records unavailable for G-23; G-24; and G-25 since installation in 2014.
- Mr. Ruiz provided me with total of 2 maintenance log entries for Aug 2014 oil changes for 2 of the 18 generators. Prior records were not provided.
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 - Keep a maintenance plan and records of conducted maintenance and must, to the extent practicable, maintain and operate the engine in a manner consistent with good air pollution control practice for minimizing emissions.
 - In addition, you must conduct an initial performance test to demonstrate compliance within 1 year after an engine and control device is no longer installed, configured, operated, and maintained in accordance with the manufacturer's emission-related written instructions.
 - For emergency generators: G-13, G-14; G-16 through G-19; Total of 6 generators:
 - All items within attached maintenance schedule: POWERTECH PLUS 9.0L 6090HF485 Tier III/Stage IIIA OEM DIESEL ENGINES --This is the document Mr. Ruiz provided me via email on 15-Dec-2015 to prove compliance with permit condition 13.c.;
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 - For emergency generator: G-12
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This is the document Mr. Ruiz provided me via email on 13-Jan-2016 to prove compliance with permit condition 13.c.;
- [NOTE: Conduct required inspections and maintenance regularly following submittal.]

VIOLATION: [Rule 220 Section 302.7; p.c. 13.c.;]

- During on-site inspection, Mr. Ruiz stated the Owner's Manuals are maintained at Jackrabbit Office but did not know where they were anymore because the office where it was kept was re-purposed but arranged to locate the owner manuals and email me excerpt's for

each respective engine manufacturer's recommended Inspection and Maintenance schedule to prove the manuals were present.

- I explained to Mr. Ruiz this is a failure to maintain an on-site copy and I was issuing an OTC violation which will be resolved by the submittal of the arranged excerpts.
- Record submittal pushed back at Mr. Ruiz's request until December 7, 2015.
- On December 15, 2015; Mr. Ruiz submitted the Manufacturer's Recommended Inspection and Maintenance excerpts excluding unit G-12 and G-15.
- On January 8, 2016; upon review of documents, I emailed Mr. Ruiz informing him I was still waiting on the owners manual's manufacturer recommended inspection and maintenance schedules for unit G-12 and G-15.
- On January 13, 2016; Mr. Ruiz submitted the owner manuals excerpts for units G-12 and G-15.

REQUIRED CORRECTIVE ACTION: [Rule 220 Section 302.7; p.c. 13.c.]

- Obtain and maintain an on-site copy of the manufacturer's written instructions.
- Provide the requested documents promptly for verification and disposition of this OTC.

AREA OF CONCERN: [Rule 324 Section 502.4; p.c. 13.a.]

Failure to keep a monthly record of engine hours of operation, for the purpose of a 12-month rolling record of engine hours as follows:

- G-12 through G-19 [Total of 8 generators.]
 - Mr. Ruiz submitted a log of engine hours for the total number of engine hours each respective generator ran for a particular calendar year, for Nov/Dec 2011, calendar years 2012 through 2015.
 - Violation based upon generator hours records provided for G-12 through G-19 on November 2011 and December 2011; which state, "unknown" quantity of hours.
On December 7, 2015; I telephoned Mr. Ruiz and explained the requirement to keep a record of the rolling 12-month engine hours. I explained to Mr. Ruiz this is not a record of the calendar year hours. Mr. Ruiz explained the non-compliance was inadvertent; and he is becoming increasingly more proficient with compliance as he learns.
- Number of hours on engine raises no concerns about exceeding allowable engine hours as quantities are very low; and I have observed improvements in record keeping of logging process for readiness and testing hours, evidenced by log sheets kept inside housing of most generators; and also evidenced by distinctions of hour logged since 2014.
- SUGGESTION: Going forward, keep records of data required for a 12-month rolling total of engine hours, for each engine. These should be presented as rolling 12-mo totals i.e. 12 monthly totals where if period requested if more than 12 consecutive months, then each consecutive 12 months has a separate 12-mo rolling total.

Gasoline Storage and Dispensing:

I observed the following:

- Facility has an above-ground 500-gallon gasoline above-ground storage tank located at the South Plant.
- There is no spill containment.
- There is no Stage I vapor recovery connection.
- The vent pipe on the tank has a double outlet vent device installed at the tip. No pressure/vacuum valve is installed on vent pipe.
- The tank already has two pressure vents installed on the top of the tank.
- Unknown tank manufacture date....not delineated in any prior permit applications, permit mod applications, TSD's, et al.
- Rule 353 Section 305.1 exemption to Farm Tanks is less stringent than 40 CFR 63.11116(a). Necessarily, the more stringent of the two regulations is applicable.
- Throughput records provided by Mr. Ruiz show a monthly throughput less than 10,000 gal/mo. The highest month noted for the period Nov-2014 though Oct-2015 was for the month of July-2015 at 2,317 gal.

VIOLATION: [Rule 353 Section 302.2 a.]

- Threaded and domed solid metal fill pipe cap, no gasket.
- I photographed this observation.
- I informed Mr. Ruiz I was issuing a NOV for the failure to have gasket on the fill pipe cap and suggested a gasket be installed immediately.
- Mr. Ruiz responded immediately by ordering the facility maintenance personnel to install a gasket on the fill pipe cap.
- On February 1, 2016; I telephoned Mr. Ruiz and reviewed the violation and corrective action required; Mr. Ruiz stated the gasket was placed on the fill pipe cap the date of inspection. I informed I would necessarily return to verify during Disposition inspection.

REQUIRED CORRECTIVE ACTION: [Rule 353 Section 302.2 a.]

- Install gasket on fill pipe cap.

VIOLATION: [40 CFR 63.11116(a)]

- The gasoline storage tank cannot lawfully be vented without controls into the outside air for an extended period of time. The presence of the double outlet vent on the vent pipe without a vapor valve of some sort is a violation of NESHAP; 40 CFR Part 63 Subpart CCCCCC. This requirement is applicable to gasoline dispensing facility's with monthly throughput < 10,000 gallons.

- On February 1, 2016; I telephoned Mr. Ruiz and informed him I was issuing this particular violation, and explained the requirement. I also explained the required corrective action for this particular violation as follows:

REQUIRED CORRECTIVE ACTION: [40 CFR 63.11116(a)]

- I suggest installation pressure/vacuum valve.

Inspection observations of unpermitted activity i.e. Fuel Burning:

VIOLATION: [Rule 200 Section 403.2]

Unpermitted L.P. (liquid propane) fuel burning equipment observed installed and in active use at facility as follows:

South Plant:

West Boiler: 1,210,000 btu/hr
 East Boiler: 1,460,000 btu/hr
 Water heater #112: 1,256,000 btu/hr
 Water heater #113: 1,256,000 btu/hr

North Plant:

Mr. Ruiz stated additional fuel burning equipment were present ancillary to North Plant, but I did not have opportunity to observe.

Fertilizer Plant:

I did not observe the L.P. fueled drum dryer, for which a permit modification has already been submitted. This equipment is not on the current permit, and I made no attempt to observe at this time.

- Total unpermitted fuel burning equipment actually observed and verified as delineated above: 5,182,000 btu/hr.
- The permit has no current L.P. fuel-burning permit conditions.
- No L.P. fuel burning equipment > 10 million btu/hr observed.
- I informed Mr. Ruiz the facility is in violation of the failure to submit a minor-modification to the permit prior to installing respective equipment.

REQUIRED CORRECTIVE ACTION: [Rule 200 Section 403.2]

- Submit minor-modification for addition of all fuel-burning equipment 300,000 btu/hr or greater to the permit.
 - Include the applicable fuel-burning equipment not observed in the North facility.
 - I suggest including a list of all fuel-burning equipment > 125,000 input btu/hr based on suggestion from Permitting Supervisor, Todd Martin.
 - Per Permitting Supervisor, Todd Martin, it is sufficient to add the above equipment to the current pending minor-modification.

AREA OF CONCERN: [Rule 200 Section 403.2]

- Mr. Ruiz stated emergency generators G-39, and G-42 replaced generators G-3 and G-4 respectively.
- Mr. Ruiz stated generator G-3 was relocated to Jackrabbit office, and G-4 was relocated to new maintenance facility under construction and part of Permit 040136, to be installed later.
- New generators G-43 and G-44 were observed on site, but not yet connected to electrical cables to provide emergency power to the facility.
- Include Emergency generators G-4, G-43, and G-44, to the minor modification prior to installation at this particular facility.
- I recommend complete list of emergency generator data be submitted along with minor-modification documents to alleviate confusion by the replacement of G-4 and its subsequent re-installation at the facility.

End report.

Documents used to determine compliance while on-site:

1) On site records

Additional documents associated with this inspection report:

- 1) Field notes
- 2) Internal mail correspondence
- 3) External email correspondence with documents attached
- 4) CUMMINS / ONAN POWER GENERATION MAINTENANCE GUIDELINES maintenance schedule
- 5) POWERTECH PLUS 9.0L 6090HF485 Tier III/Stage IIIA OEM DIESEL ENGINES maintenance schedule
- 6) Detroit Diesel Series 60 Engine Operator's Guide, Serial Number 162036 maintenance schedule
- 7) Katolight (Owner Manual) Serial Number 161491 maintenance schedule
- 8) Inspection photos

Date: 12-Feb-16

OFFICE USE
rec:
rev:



Maricopa County
Air Quality Department
Compliance & Enforcement Division
Photo Attachment Page

Subcontractor:

☐ Yes ☒ No

Company : Hickman's Egg Ranch, Inc.

Permit Number : 040136

Date of Violation : 20-Nov-15

Site Location : 32425 W. Salome Hwy., Arlington, AZ

Inspector : Shannon Klimek #92

Violation Number : 735371

Location of Photos : P:\DUST COMPLIANCE\INSPECTORS\Klimek\Inspection Photos\040136_20NOV15_pics



Photo 1 of 21
Direction: N
Description:
Emergency generator unit G-4.
Disconnected ATI. Located near
installation's Well #6. Most recent
maintenance log inside unit (see
IMG_1835).
File: IMG_1834.jpg

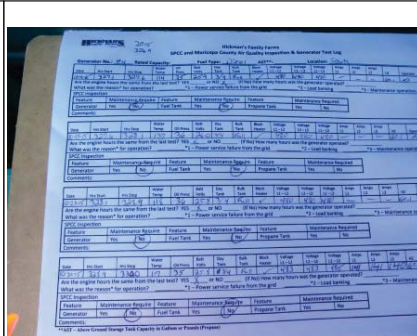


Photo 2 of 21
Direction: n/a
Description:
Maintenance log for G-4. Unit is
disconnected and moved from
previous location. Last recorded
readiness PM on this sheet. See detail
IMG_1835(cropped).jpg.
File: IMG_1835.jpg

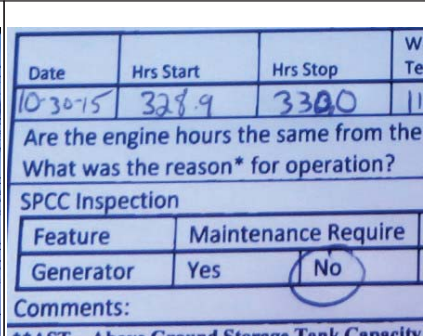


Photo 3 of 21
Direction: n/a
Description:
DETAIL of IMG_1835.jpg showing Unit
G-4's last maintenance on 10-30-15;
with 330.0 engine hours last logged
showing engine was installed and
operating until 10-30-15.
File: IMG_1835(cropped).jpg


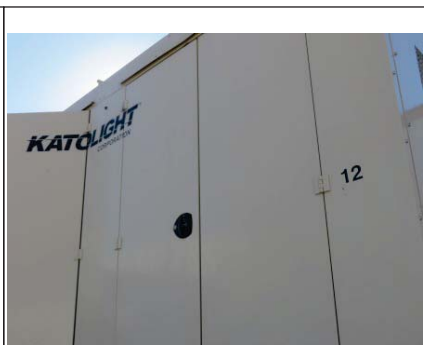





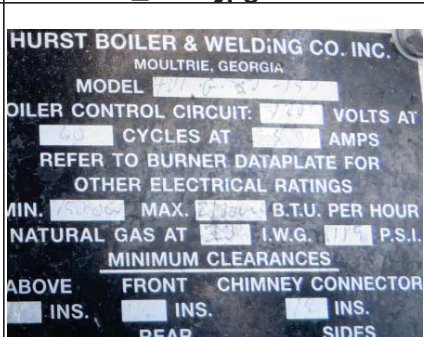
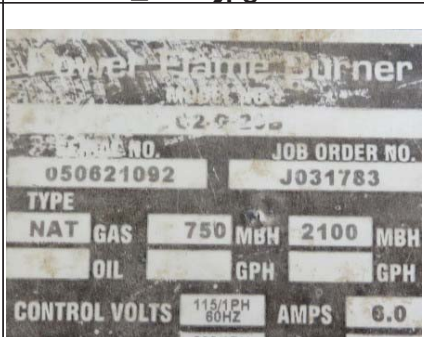
		
<p>Photo 4 of 21 Direction: not logged Description: Unit G-4 oil filter shows last oil change (logged on oil filter) 8-14-14 which is 14.5 months prior to engines last operating date and evidence the oil filter change did not occur within the MACT ZZZZ annual requirement. File: IMG_1836(cropped).jpg</p>	<p>Photo 5 of 21 Direction: not logged Description: SUBJECT: Unit G-12 emergency generator housing. File: IMG_1768.jpg</p>	<p>Photo 6 of 21 Direction: Description: DETAIL: Unit G-12 oil filter with logged filter change on 8-20-14. This generator is connected and exceeds the annual requirement to change oil filter. File: IMG_1769(cropped).jpg</p>
		
<p>Photo 7 of 21 Direction: NNE Description: SUBJECT 500-gallon gasoline storage tank located at South Arlington facility. File: IMG_1701.jpg</p>	<p>Photo 8 of 21 Direction: NNW Description: SUBJECT: 500-gallon gasoline storage tank threaded fill cap. File: IMG_1703.jpg</p>	<p>Photo 9 of 21 Direction: NNW Description: DETAIL: fill cap missing required gasket. File: IMG_1704.jpg</p>
		
<p>Photo 10 of 21 Direction: NW Description: SUBJECT Hurst Boiler located at West end of South Plant. Frank Ruiz stated this boiler is fueled by propane. This boiler was not listed on facility's permit. File: IMG_1706.jpg</p>	<p>Photo 11 of 21 Direction: Description: SUBJECT Hurst Boiler plate has etched Max: 2100000 B.T.U. PER HOUR (2.1 MM btu/hr). Plate referenced Burner dataplate (see IMG_1707(cropped)). File: IMG_1708(cropped).jpg</p>	<p>Photo 12 of 21 Direction: Description: Hurst Boiler's Burner dataplate noting gas MBH at 2100. Converted that is 2100 MM btu/hr but more likely at 2100 M btu/hr which has parity between first plate in IMG_1708 (cropped) i.e. 2.1 MM btu/hr. File: IMG_1707(cropped).jpg</p>



Photo 13 of 21
Direction: NE
Description:
 Boiler room with boiler observed on SW exterior of South Plant. See SUBJECT and DETAIL photos IMG_1710 and IMG_1712.
 File: IMG_1711.jpg



Photo 14 of 21
Direction: NE
Description:
 SUBJECT P-35 boiler.
 File: IMG_1710.jpg

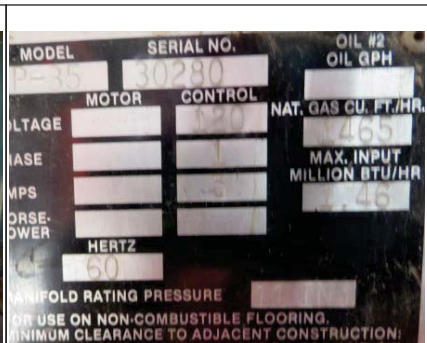


Photo 15 of 21
Direction: not logged
Description:
 DETAIL of P-35 boiler plate evidences input 1.46 million btu/hr.
 File: IMG_1712(cropped).jpg



Photo 16 of 21
Direction: NE
Description:
 Boiler room with two water heaters observed on SW exterior of South Plant. See SUBJECT and DETAIL photos IMG_1714 and IMG_1720.
 File: IMG_1713.jpg



Photo 17 of 21
Direction: E
Description:
 SUBJECT Lochinvar water heater pair. Operator identified unit numbers 112 and 113.
 File: IMG_1714.jpg



Photo 18 of 21
Direction: NE
Description:
 SUBJECT Lochinvar Water heater Unit 112.
 File: IMG_1720.jpg

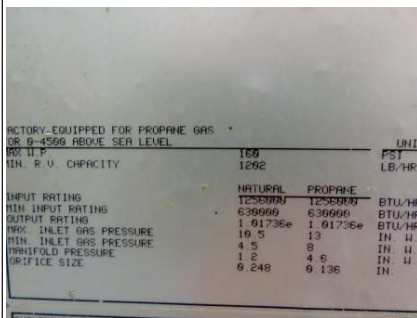


Photo 19 of 21
Direction: SW
Description:
 DETAIL Lochinvar Water heater Unit 112 input rating: 1,256,000 million btu/hr.
 File: IMG_1722(cropped).jpg



Photo 20 of 21
Direction: NE
Description:
 SUBJECT Lochinvar Water heater Unit 113.
 File: IMG_1715.jpg

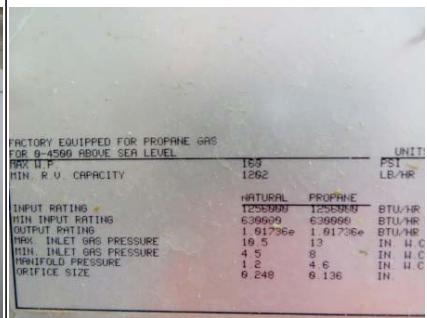


Photo 21 of 21
Direction: SW
Description:
 DETAIL Lochinvar Water heater Unit 113 input rating: 1,256,000 million btu/hr.
 File: IMG_1718(cropped).jpg

Generators Information for the Arlington Facilities

Equip. No.	Type	Generator Brand & Engine Type	HP	Engine Model	Engine Serial Number	Year	Generator Model #	KV A	Emission Data Sheet Submittal	Last logged Maint.	Hours
G-2 IMG_1817 IMG_1818 IMG_1826	CI	Onan, Cummins	380	LTA-10G1	34912119	4/1998	230DFAB	230	--- not requested IMG_1828	12-Aug-14 IMG_1827	29.0
G-3	CI	Onan, Cummins	380	LTA-10G1			230DFAB	230	--- not requested Allegedly relocated to Jackrabbit Facility	14-Aug-14	n/o
G-4 IMG_1834	CI	Onan, Cummins	380	LTA-10G1	34992846 IMG_1837	1/2000	230DFAB	230	--- not requested Taken out of svc 30-Oct-15 <> 19Nov15	14-Aug-14 IMG_1835 IMG_1836	n/o
G-5 IMG_1735	CI	Onan, Cummins	380	LTA-10G1	35033391 IMG_1736	3/2001	230DFAB	230	--- not requested	14-Aug-14	738.9
G-6 IMG_1750	CI	Onan, Cummins	380	LTA-10G1	34983416 IMG_1751	11/1999	230DFAB	230	--- not requested		697.6
G-7 IMG_1741	CI	Onan, Cummins	380	LTA-10G1	35093153 IMG_1742	3/2004	230DFAB	230	--- not requested		635.1
G-8	SI	Onan	5.5	5.5HGJA	2144B IMG_1752 IMG_1753 IMG_1754 IMG_1755	2000	J040702290	5.5	--- not requested		494.1
G-9 IMG_1725	CI	Onan, Cummins	380	LTA-10G1	43301310 IMG_1726	11/2005	230DFAB	230	--- not requested	14-Aug-14	510.2

G-1	CI	Onan, Cummins	755	QSL9-G9	79425440 IMG_1727	5/2010	350DFEG	350	350DFEG2.pdf	14-Aug-14	215.5
G-10 IMG_1743	CI	Onan, Cummins	364	QSL9-G2	46727779 IMG_1745	3/2007 IMG_1744	200DSHAC	200	None provided		419.0
G-11 IMG_1737	CI	Onan, Cummins	399	QSL9-G3 NR3	21788695 IMG_1740	7/2007 IMG_1739	250DQDAA	250	QSL9-G3.pdf	14-Aug-14	418.1 IMG_1738
G-12 IMG_1768	CI	Katolight, Detroit	685	Series 60	06R0977664	2008	SED350FRX 4T3 39689	350	IMG_1771	20-Aug-14 IMG_1769	475.4 IMG_1770
G-13 IMG_1772	CI	Katolight, John Deere	422	6090HF485	RG6090L036322 IMG_1774	2008	SED250FRJ4 T3 39372 IMG_1775 IMG_1777 IMG_1778	250	None provided MAYBE	20-Aug-14 IMG_1776	370.5 IMG_1773
G-14 IMG_1779	CI	Katolight, John Deere	237	6090HF485	RG6090L036341 IMG_1781	2008	SED250FRJ4 T3 39372 IMG_1782 IMG_1784 IMG_1785	250	None provided MAYBE	20-Aug-14 IMG_1783	368.5 IMG_1780
G-15 IMG_1760	CI	Katolight, John Deere	422	6068HF285K, L IMG_1762	PE6068L030019 IMG_1766	2008	SED150FRJ4 T3 39374 IMG_1763 IMG_1764 IMG_1765	150	None provided MAYBE	14-Aug-14 IMG_1761	402.9 IMG_1767
G-16 IMG_1786	CI	Katolight, John Deere	422	6090HF485	RG6090L045740 IMG_1788	2008	SD150RJ6T3 IMG_1790	250	None provided MAYBE	20-Aug-14 IMG_1789	350.2 IMG_1787
G-17 IMG_1791	CI	Katolight, John Deere	422	6090HF485	RG6090L074273 IMG_1792	2010	250RJS6T3 IMG_1794	250	None provided MAYBE	20-Aug-14 IMG_1793	263:1
G-18 IMG_1795	CI	Katolight, John Deere	422	6090HF485	RG6090L086394 IMG_1796	2010	250RJS6T3 IMG_1797 IMG_1798	250	None provided MAYBE	10-Oct-14 IMG_1799	203:4
G-19 IMG_1800	CI	Katolight, John Deere	422	6090HF485	RG6090L086399 IMG_1802	2010	250RJS6T3 IMG_1803 IMG_1804	250	None provided MAYBE	10-Oct-14 IMG_1805	182:48 IMG_1801
G-20 IMG_1806	CI	Cummins	399	QSL9-G3 NR3	73392810 IMG_1810 IMG_1811	4/2012 IMG_1809	250DQDAA	250	QSL9-G3.pdf	11-Oct-14 IMG_1808	145.2 IMG_1807
G-21 IMG_1812	CI	Cummins	399	QSL9-G3 NR3	73363886 IMG_1815	2/2012 IMG_1814	250DQDAA	250	QSL9-G3.pdf	11-Oct-14 IMG_1816	141.9 IMG_1813
G-22 IMG_1746	CI	Cummins	464	QSL9-G7	73427880 IMG_1748 IMG_1749	7/2012 IMG_1747	250DQDAA	250	250DQDAA2.pdf		147.8

Equip. No.	Type	Engine Type	Horse Power	Engine Model	Engine Serial Number	Year	Generator Model #	KV A	Emission Data Sheet Submittal	Last logged Maint.	Hours
G-23 IMG_1819	CI	Cummins IMG_1827	464	QSL9-G7	73576538 IMG_1822	8/2013 IMG_1821	250DQDAA	250	250DQDAA2.pdf	Never IMG_1823	129.3 IMG_1824
G-24 IMG_1728	CI	Cummins	464	QSL9-G7	73548836 IMG_1729	6/2013 IMG_1730	250DQDAA	250	250DQDAA2.pdf		90.2
G-25	CI	Cummins	464	QSL9-G7	73647077 IMG_1831	2/2014 IMG_1830	250DQDAA	250	250DQDAA2.pdf	Never IMG_1832	98.2 IMG_1833
FM-1 IMG_1756	CI	Cummins	324	QSB7-G5 NR3	73385901 IMG_1758	4/2012	125DSGBA	125	IMG_1759	14-Aug-14 IMG_1757	167.1
G-39	CI	Cummins	464	QSL9-G7	73867529 IMG_1732	7/2015 IMG_1731	250DQDAA	250	250DQDAA2.pdf		28.4
G-42	CI	Cummins	464 HP	QSL9-G7	73892847 IMG_1734	9/2015 IMG_1733	250DQDAA	250	250DQDAA2.pdf		5.7
G-43	CI	Cummins	464 HP	QSL9-G7	73884827	2015	250DQDAA	250	--- not requested Not connected	IMG_1838	n/o
G-44	CI	Cummins	464 HP	QSL9-G7	73882330	2015	250DQDAA	250	--- not requested Not connected	IMG_1838	n/o



Maricopa County

Air Quality Department

This page/document containing confidential information has been removed.

Document Information:

- Air Quality Violation Penalty Calculation Worksheet



Maricopa County

Air Quality Department

The video(s) and/or photo(s) associated with this record, 040136_NOV735371_20NOV15_pics, are stored in: P:\DUST COMPLIANCE\INSPECTORS\Klimek\Inspection Photos\040136_20NOV15_pics